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Site Name RADCLIFFE MARINE (PRIVATEER BOATS)

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DocDate 6/13/2008

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Box SF4068

AccessLevel PUBLIC

Division WASTE MANAGEMENT

Section SUPERFUND

Program IHS (IHS)

DocCat FACILITY

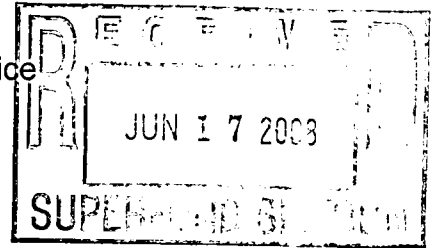
**MEMO**

**TO:** John Walch, Supervisor  
Inactive Hazardous Sites Branch, Central Office

**FROM:** Rose Ballance, Hydrogeologist *RB*  
UST Section, Washington Regional Office

**DATE:** June 13, 2008

**RE:** Project/File Transfer – Radcliffe Marine (Privateer Boats)  
Belhaven, Beaufort County  
Incident No.: 85050



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Attached are our files for the above referenced incident for transfer into the Inactive Hazardous Sites program.

The incident began as a non-UST petroleum incident in 1995 when petroleum related contaminants were detected and later confirmed during a follow-up investigation in 1996. Contaminants detected above the 2L standards were benzene (31 µg/L) and ethylbenzene (to 3,200 µg/L).

Through the years that followed, the RP has been requested to conduct a follow-up to determine if "...soil and/or groundwater contamination still exists".

Finally, in May this year, a consultant collected a groundwater sample in the area where the highest concentrations had been found previously. The only contaminant detected above 2L standards was vinyl chloride at a concentration of 1.17 micrograms per liter. The initial soil samples had been collected below the seasonal high water table. Therefore, soil samples were not collected as part of the follow-up.

Please call me at 252-948-3949 if you have questions.

Attachments



## North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor  
William G. Ross Jr., Secretary

June 20, 2008

Mr. Gilbert Radcliffe  
Radcliffe Marine Sales, Inc.  
P.O. Box 57  
Belhaven, NC 27810

**STATE FILE**

**Re: NOTICE OF REGULATORY REQUIREMENTS FOR CONTAMINANT ASSESSMENT  
AND CLEANUP**

Radcliffe Marine Sales, Inc. Facility  
Hwy 264  
Belhaven, Beaufort County, NC

Dear Mr. Radcliffe:

On June 13, 2008 the Underground Storage Tank (UST) Section of the Division of Waste Management referred the subject site to the Inactive Hazardous Sites Branch. The information provided by the UST Section indicates that one or more hazardous substances have contaminated the subject site. Depending on the contaminants involved and whether the contaminants have impacted or may impact groundwater quality, you will be required to assess and cleanup the contamination under one or more cleanup authorities. Regulatory oversight for the assessment and cleanup under all applicable authorities will be provided by the Division of Waste Management through its Superfund Section, Inactive Hazardous Sites Branch ("Branch").

Based on information provided to date, the Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310, et seq., applies to your site. In addition, initial immediate actions may be required under 15A NCAC 2L, Groundwater Classifications and Standards.

### **I. ACTIONS REQUIRED AT THIS TIME:**

#### **Complete the Site Cleanup Questionnaire.**

To comply with the requirements of State law, a Site Cleanup Questionnaire, available on the website noted at the end of this letter, must be completed and returned to this office. The information you provide will be reviewed along with other information to prioritize the site, so please make certain that the information you provide is complete and accurate. Please note that your failure to inform the Branch of any nearby potable wells or other high risk conditions may adversely affect the Branch's ability to identify this site as a higher-risk site.

### **Take Initial Abatement Actions Required Under 15A NCAC 2L.**

If you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of contamination. Beyond initial abatement actions, all assessment and remediation will be done through the IHSRA.

## **II. FUTURE ASSESSMENT AND CLEANUP ACTIVITIES:**

All correspondence regarding this site should be sent to the Branch. Future assessment and cleanup activities (activities conducted after the initial abatement steps required in 15A NCAC 2L) may be conducted through the Voluntary Cleanup Program (discussed below) or pursuant to an Order issued under N.C. Gen. Stat. § 130A-310.3. In addition, if you choose not to conduct a cleanup through the Voluntary Cleanup Program, the site may be referred to the United States Environmental Protection Agency ("EPA"). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act ("CERCLA").

## **III. VOLUNTARY CLEANUP PROGRAM:**

Under the IHSRA, persons who move forward to assess and remediate contamination, without being compelled to do so through formal legal action filed against them, are called "volunteers." To participate in the voluntary cleanup program, you will be required to enter into an administrative agreement with the Branch. The voluntary cleanup will proceed through the Registered Environmental Consultant Program or under direct oversight by the Branch Staff, as discussed below:

### **Agreement to Conduct Assessment and Remediation Through the Registered Environmental Consultant Program.**

The Branch has a privatized oversight arm of the voluntary cleanup program known as the Registered Environmental Consultant ("REC") program. Based on the responses provided on the questionnaire (degree of hazard and public interest in the site), the Branch will determine whether a staff person or an REC will perform the oversight and approval of your assessment and cleanup action. Please note that having one or more of the conditions identified on the questionnaire does not necessarily preclude the site for qualifying for an REC-directed cleanup action.

Under the REC program, the volunteer hires an environmental consulting firm, which the State has approved as having met certain qualifications, to implement a cleanup and certify that the work is being performed in compliance with regulations. In other words, the REC's certifications of compliance are in place of direct oversight by the Branch. Details of the REC program can be found at <http://www.wastenotnc.org/sfhome/recprog.htm>. If you have any questions specific to the REC Program, including how to participate, please contact the REC Program Manager, Kim Caulk, at (919) 508-8451.

**Agreement to Conduct Assessment and Remediation Under State Oversight.**

If the Branch determines that the site should be assessed and remediated pursuant to direct State oversight, it will not be eligible for a REC-directed cleanup. Rather, the remedial action will receive direct oversight by Branch staff.

**IV. FAILURE TO RESPOND:**

If we do not receive a completed questionnaire, the Branch will take further action to prioritize the site without your input. Failure to take the initial abatement steps required in 15A NCAC 2L may result in the assessment of a civil penalty against you. In addition, the Branch may seek an injunction compelling compliance with the initial abatement steps required in 15A NCAC 2L. For future work beyond the initial abatement steps required pursuant to 15A NCAC 2L, a unilateral Order may be issued pursuant to § 130A-310.3 to compel assessment and cleanup.

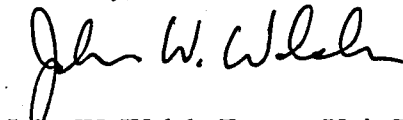
**V. ADDITIONAL INFORMATION REGARDING THE IHSRA AND THE BRANCH:**

People are often confused by the name of the Inactive Hazardous Sites Response Act and the Branch. By definition, "Inactive Hazardous Sites" are any areas where hazardous substances have come to be located and would include active and inactive facilities and a variety of property types. The term "inactive" simply refers to the fact that cleanup was inactive at large numbers of sites at the time of program enactment. Additional information about the Branch may be found at <http://www.wastenotnc.org/sfhome/ihsbrnch.htm>.

Submit completed questionnaire to: Ginny Henderson  
Inactive Hazardous Sites Branch  
127 Cardinal Drive Extension  
Wilmington, NC 28403

If you have additional questions about the requirements that apply to your site, please contact call me at (919) 508-8485.

Sincerely,



John W. Walch, Eastern Unit Supervisor  
Inactive Hazardous Sites Branch  
Superfund Section



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor  
William G. Ross Jr., Secretary

Division of Waste Management  
Underground Storage Tank Section

Dexter R. Matthews, Director

June 13, 2008

Mr. Gilbert Radcliffe  
Radcliffe Marine Sales, Inc.  
P.O. Box 57  
Belhaven, NC 27810

Re: Radcliffe Marine, Inc. Facility  
Highway 264  
Belhaven, Beaufort County  
Incident No.: 85050

Dear Mr. Radcliffe:

On June 11, 2008, the Washington Regional Office Underground Storage Tank (UST) Section received a groundwater sampling report from your consultant Geological Resources, Inc. The report documents the results of groundwater sampling at the above referenced facility in May 2008. A groundwater sample was collected from a temporary monitoring well in the area where petroleum contaminants were detected in 1996.

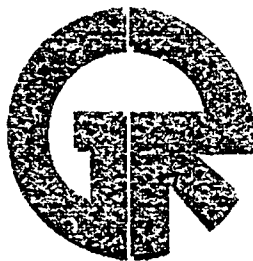
No petroleum contaminants were detected in the recently collected sample above the applicable cleanup standards (NCAC 15A 2L). Vinyl chloride (a non-petroleum contaminant) was detected at a concentration of 1.17 micrograms per liter ( $\mu\text{g/L}$ ), slightly above its standard of 0.015 ( $\mu\text{g/L}$ ). Because of the vinyl chloride exceedance, this incident has been transferred to the Division of Waste Management Inactive Hazardous Sites Branch in Raleigh.

If you have questions, please call me at 252-948-3949 or John Walch, Supervisor, Inactive Hazardous Sites Branch at 919-508-8485.

Sincerely,

Rose Ballance, P.G.  
Hydrogeologist  
Washington Regional Office

c: ✓ John Walch, Inactive Hazardous Sites Branch, Central Office  
Geological Resources, Inc., 2301 Crown Point Executive Drive, Suite F, Charlotte, NC 28227



Received  
Ward DWM  
APR 22 2008

## Geological Resources, Inc.

April 18, 2008

Mr. Gilbert Radcliffe  
Privateer Boats  
Belhaven, NC

FACSIMILE  
252-943-3010

Re: Proposal # 08-168-GRI  
Privateer Boats  
Ground Water Sample  
Belhaven, Beaufort County

Dear Mr. Radcliffe:

Geological Resources, Inc. (GRI) presents this proposal which includes costs associated with collecting a ground water sample at the above referenced site in accordance to your request on April 16, 2008. This proposal is based upon the scope of work assumptions and responsibilities and estimated costs detailed below.

### SCOPE OF WORK

GRI proposes to install one (1) temporary monitoring well in the location of previous sampling locations identified as GP-4/GP-9/GP-5 to an estimated depth of ten feet below ground surface. A ground water sample will be collected from the temporary monitoring well upon completion of the installation and submitted for laboratory analyses for volatile organic compounds using EPA Method 6210D. The temporary monitoring well will be installed and abandoned by a North Carolina licensed well contractor.

Subsequent to receipt of the laboratory analytical report, GRI will prepare letter report documenting the results of site activities. The report will be suitable for submittal to NCDENR. The report will contain all appropriate site maps, laboratory analytical data, copies of laboratory reports and chains-of-custody, data interpretation and recommendations. The report will be sealed by a North Carolina licensed geologist and/or engineer.

### ASSUMPTIONS AND RESPONSIBILITIES

GRI assumes all activities will be completed in an expeditious manner. No standby time is included in this proposal. Standby time, if necessary, will be billed on a time and materials basis.

2301 Crown Point Executive Drive Suite F Charlotte, NC 28227  
Phone: (704) 845-4010 / (888) 870-4133 Fax: (704) 845-4012

Proposal # 08-168-GRI  
Privateer Boats  
Ground Water Sampling Event  
Page 2 of 2

GRI assumes that no hazardous waste is encountered at the site. Costs for sampling, handling, transportation and disposal of hazardous waste are not included in this proposal.

GRI assumes that all activities will be conducted during normal business hours (M-F; 0700-1700).

#### ESTIMATED COSTS

Description	Cost
Temporary Monitoring Well Installation & Sampling (including travel time) (est. 5 hours @ \$70.00/hr.)	\$350.00
On-site Supervision Round Trip Travel (est. 100 miles @ \$0.75/mile)	\$75.00
Laboratory Analyses 1 sample by EPA Method 6210D @ \$110/sample	\$110.00
Project Manager (including Letter Report and Health and Safety Plan) (3 hours @ \$70.00/hour)	\$210.00
Senior Review (Licensed Geologist/Engineer) (1 hour @ \$100.00/hour)	\$100.00
CAD (2 hours @ \$55.00/hour)	\$110.00
Clerical (1 hour @ \$45.00/hour)	\$45.00
<b>Total</b>	<b>\$1,000.00</b>

Please note that GRI will only invoice for actual costs incurred while conducting the proposed assessment activities. Furthermore, if additional time is incurred the hourly rates above apply.

To authorize this scope of work, please the attached Services Agreement and return to GRI by fax to 704-845-4012. Please contact Justin Radford at 252-341-7876 with any questions or comments.

Sincerely,



Justin Radford, P.G.  
Project Manager

cc: file



**PROFESSIONAL SERVICES AGREEMENT**  
**In Reference to Proposal # 08-168-GRI**

- I. SERVICES.** Geological Resources, Inc. ("GRI") proposes to perform the services for the undersigned client ("CLIENT") at the fees and costs set forth in the scope of services and cost proposal attached hereto and incorporated herein by reference (the "Services"). GRI represents and warrants that the Services will be performed in a manner consistent with customary industry standards. No other representation, warranty, or guaranty, expressed or implied, is intended.
- II. FEES.** GRI reserves the right to revise its fee schedule subject to thirty (30) days written notice. In the event GRI revises its fee schedule, CLIENT shall have fifteen (15) days from receipt of notice of the revision to determine whether to terminate this Agreement. Any revision to the Services shall be pursuant to a written change order agreed to in advance by CLIENT and made a part of this Agreement.
- III. CONFIDENTIALITY.** The Services are solely for the benefit of CLIENT. This Agreement shall not be construed as creating any contractual relationship of any kind between GRI and any third party. The information and materials provided by GRI to CLIENT in connection with the Services shall be utilized by CLIENT only for the purposes contemplated by this Agreement, and shall not be provided by CLIENT to third parties without the prior written consent of GRI, except that GRI agrees that information and materials provided by GRI to CLIENT may, if required, be provided to and used by governmental regulatory agencies, CLIENT's attorneys, and pursuant to any valid court order. GRI agrees that all reports and other documents prepared for CLIENT pursuant to this Agreement are the property of CLIENT. GRI also agrees that it will not disclose to any third party any documents, reports, laboratory data or other information generated, created or produced for CLIENT pursuant to this Agreement unless required by law, pursuant to a valid court order, or upon written instruction of CLIENT.
- IV. CLIENT DISCLOSURES.** CLIENT shall notify GRI of any known or suspected hazardous substances or conditions on the property upon which the Services are to be performed which in anyway relate to or affect the Services and GRI shall have the right to rely on the accuracy of such CLIENT-furnished information. Thereafter, GRI shall take all reasonably necessary and appropriate measures to protect its employees, agents and subcontractors against such possible hazards and to prevent adverse impacts to the environment. The cost of such measures shall constitute a revision to the Services and shall be managed in accordance with Section II of this Agreement.
- V. RIGHT OF ENTRY.** GRI is to have free access to the applicable properties at the times and on the dates Services are scheduled. Delays to GRI are subject to waiting time charges to the extent such delays are caused by CLIENT or its employees, contractors or agents. GRI shall take reasonable and customary precautions to prevent damage to CLIENT's property. CLIENT understands that the discovery of certain hazardous substances and conditions and/or the taking of preventive measures relative to these substances and conditions may result in a reduction of the value of the property upon which the substance or condition is found to exist or on which the preventative measures are taken. Accordingly, CLIENT waives any claim against GRI and its subcontractors and agrees to defend, indemnify and hold GRI and its subcontractors harmless from any claim based upon the diminished value of real property allegedly arising from the discovery of a hazardous substance or condition or the taking of a preventive measure, unless such claim is based upon GRI's gross negligence.

VI. **INDEMNIFICATION**. GRI will defend, indemnify and hold harmless CLIENT and its representatives, agents, employees and successors and assigns from and against any and all claims, suits, actions, losses, penalties, fines and damages of any nature whatsoever, including reasonable attorney's fees, expert witness fees, consultant fees and court costs (collectively "Legal Claims and Costs") arising or resulting from (1) GRI's breach of this Agreement; and/or (2) GRI's negligence or intentional misconduct. In addition to the specific provisions set forth above, CLIENT will defend, indemnify and hold harmless GRI and its representatives, agents, employees and successors and assigns from and against any and all Legal Claims and Costs arising or resulting from (1) CLIENT's breach of this Agreement; and/or (2) CLIENT's negligence or intentional misconduct, and (3) the existence of any hazardous substance or condition at any site(s) where Services are performed, unless the negligent conduct of GRI exacerbates and causes the spread of such hazardous substance(s) or the development of such hazardous condition.

VII. **PAYMENT TERMS** CLIENT agrees to pay all charges as set forth in the GRI Proposal # 08-168-GRI. Payment is due upon receipt of invoice. Payments not received within 30 days are subject to a finance charge of 1.5% per month (18% annually). Additionally, any subcontractor invoices will be forwarded directly to the client for direct payment to the subcontractor.

VIII. **COMPLETE AGREEMENT**. This Agreement, along with its attachments, including the GRI Proposal # 08-168-GRI incorporates all of the provisions and contemporaneous discussions, representations, understandings, and agreements between the parties with respect to the subject matter of this Agreement. The terms and conditions expressed in this Agreement shall not be altered except in writing, signed by both parties.

IX. **APPLICABLE LAW**. This Agreement is governed by, and will be construed in accordance with the laws of the state where such property is located.

Executed as of the latest date set forth below.

**GRI:**

**CLIENT:**

**GEOLOGICAL RESOURCES, INC.**

**MR. GILBERT RADCLIFFE  
PRIVATEER BOATS**

By: \_\_\_\_\_

By: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor  
William G. Ross Jr., Secretary

Division of Waste Management  
Underground Storage Tank Section

Dexter R. Matthews, Director

FAX

TO: Justin Radcliff

COMPANY: GRI

FAX No.: 252-321-6094

FORM: Rose Ballance, Division of Waste Management UST Section  
Washington Regional Office

DATE: April 18, 2008

Data for Radcliffe Marine (Privateer)

No. of Pages:

15

# SOIL AND GROUNDWATER INVESTIGATION REPORT

**RADCLIFFE MARINE  
BELHAVEN, NORTH CAROLINA**

CORP ID 0119993

RADCLIFFE MARINE SALES  
INC.  
GILBERT L. RADCLIFFE  
CAMONT ST.  
BELHAVEN

*Prepared for:*

**RADCLIFFE MARINE SALES, INC.**

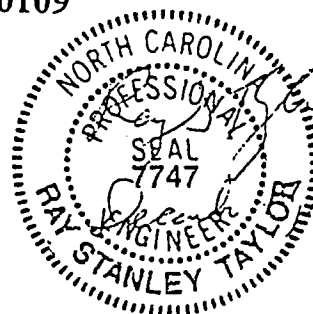
*Approved by:*  
*DATE: 1-1-97*

*Prepared by:*

*Petroleum Used in analysis  
Standard Test methods;  
RADCLIFFE N.E. LESTER*

**TRIANGLE ENVIRONMENTAL, INC.  
RALEIGH, NC**

**TRIANGLE PROJECT NO. 676-0109**



**DECEMBER 1996**

Figure 3 shows the locations of these samples. The data suggest localized areas of contamination.

### 3.0 FIELD ACTIVITIES

On October 28, 1996, a Triangle geologist supervised the advancement of seven soil probes. A Geoprobe unit collected continuous soil samples using 48-inch long Macro-Core samplers. New plastic liners were used for each sample. The samplers were decontaminated between samples and the push rods were decontaminated between wells. The soils were described and representative samples were collected for laboratory analysis. The soil samples were placed in laboratory-supplied glassware, stored in an ice-filled cooler, and shipped to an analytical laboratory certified by the North Carolina Department of Environment, Health and Natural Resources (NC DEHNR) using standard chain-of-custody procedures.

The probe locations were chosen to match as close as possible the locations in the previous investigation with the highest acetone concentrations, except GP-3, which was located to collect a background sample. Locating the old soil borings was difficult since most of the 55-gallon storage drums have been removed, according to Larry Perry and Dick Denton of the NC DSWM. Additionally, not all locations were accessible to the four-wheel drive truck mounted Geoprobe.

At the first probe location, GP-1, the sampler was pushed to 11 feet below ground surface to obtain a core of the site stratigraphy. Temporary monitoring wells were installed at three probe locations (GP-2, GP-3, and GP-4). The monitoring wells were constructed of 1-inch diameter PVC pipe and slotted screen. After allowing time for the water level in each temporary monitoring well to equilibrate, an electronic water level indicator was used to measure depth-to-water. The well was then purged of a minimum of three well volumes and

samples were taken using new disposable bailers for each well. The relative top of casing elevation was surveyed for each well.

At three other probe locations, GP-5, GP-6, and GP-7, a slotted groundwater sampler was advanced beyond the base of the soil probe hole. Disposable tubing with a stainless steel bottom check valve was inserted through the push rods and reciprocated to collect water samples. The water samples were placed in laboratory-supplied glassware, stored in an ice-filled cooler, and shipped to an analytical laboratory certified by the NC DEHNR using standard chain-of-custody procedures. At the laboratory, the samples were analyzed for volatile organic compounds using Method SW-846 8260.

At the end of the day, the temporary monitoring wells were removed and all probe holes were filled with bentonite chips. Soil boring logs, groundwater sampling data sheets, and survey data sheets are presented in Appendix A.

#### 4.0 GROUNDWATER RECEPTORS

A windshield survey was conducted in the area surrounding the Radcliffe Marine facility. Two domestic water-supply wells were noted during the survey. Their approximate positions are shown on Figure 1a. The well on Pantego Road appears to be located greater than 1,500 feet from the site. The other domestic well, owned by Cox Chevrolet, is within a 1,500 foot radius of the site. The Town of Belhaven has two municipal water-supply wells. Reportedly, the wells are screened from 100 to 160 feet below ground surface. According to information provided from town personnel, the approximate positions of the two wells are shown on Figure 1a.

## 5.0 SOIL INVESTIGATION

The site is located on relatively high ground with marsh bordering the property to the northwest and southwest (Figure 2). There appears less than 5 feet of natural topographic relief within 1,500 feet of the site.

The site is located within the Coastal Plain physiographic province. The upper soils at the site were described as predominantly sand. One soil probe, GP-1, was extended to 11 feet below grade. A clayey sand was observed at approximately 9 feet below land surface in samples from GP-1.

Acetone was not detected above the method quantitation limit of 0.06 mg/kg in the four soil samples collected during the current investigation. Volatile organic compounds consistent with mineral spirits were detected in sample GP-4 collected 2.4 feet below the ground surface near the top of the water table (Table 1, Appendix B). The compounds and the detected concentrations are: n-butylbenzene at 0.037 mg/kg, sec-butylbenzene at 0.056 mg/kg, ethylbenzene at 0.90, isopropylbenzene at 0.032 mg/kg, p-isopropylbenzene at 0.053 mg/kg, n-propylbenzene at 0.12 mg/kg, 1,2,4-trimethylbenzene at 1.2 mg/kg, 1,3,5-trimethylbenzene at 0.034 mg/kg, and naphthalene (a semivolatile compound) at 0.97 mg/kg. A shallower sample collected from GP-4 at 1 feet below ground surface did not contain any detectable concentrations of contaminants.

## 6.0 GROUNDWATER INVESTIGATION

Groundwater at the site occurs within two to three feet of ground surface. A water table map was generated, assuming a planar surface, from the depth-to-groundwater data collected from the three temporary monitoring wells (GP-2, GP-3, GP-4) on October 28, 1996. The true

groundwater table may be more complex than shown and may fluctuate with rainfall. The net movement of groundwater should be northwest towards the marsh.

Groundwater samples were collected in the three temporary wells (GP-2, GP-3, and GP-4) and at three other Geoprobe points (GP-5, GP-6 and GP-7). Temporary well GP-4 was sampled in duplicate. The duplicate sample was labeled GP-9. Acetone was not detected above the method quantitation limit of 50 µg/L in the groundwater samples. Laboratory analysis identified volatile organic compounds consistent with mineral spirits from the groundwater samples at GP-4 and GP-5 (Table 1, Appendix B). The compound MTBE, detected in low concentrations in the sample from GP-2, is an additive for unleaded gasoline.

Several volatile organic compounds were detected in concentrations above listed North Carolina Groundwater Quality Standards. These compounds and their maximum detected concentrations are: benzene at 31 µg/L, ethylbenzene at 3,200 µg/L, and xylenes at 710 µg/L. Naphthalene and MTBE were detected in the groundwater sample from GP-2, but within North Carolina Groundwater Standards.

## 7.0 CONCLUSIONS

which samples?

- Based on the data collected during the current and previous investigation, Triangle concludes that the earlier identified acetone soil contamination is very localized. In addition, there is no data which indicates that the groundwater has been impacted by acetone.
- Volatile organic compounds typically associated with mineral spirits were detected in soil and groundwater samples during the current investigation. The source of the contamination is unknown but may be related to random spills related to solvent usage on the site. The compound MTBE, which is an unleaded-gasoline additive, may be from



localized surface spillage from boats under repair and was detected in low concentrations in one groundwater sample.

- No solvent contamination was detected either in soil or groundwater at concentrations near or above TCLP regulatory levels.
- Triangle believes no further action is necessary on this site in response to hazardous waste regulations.

**Table 1**  
**Laboratory Data Summary - Soil Analysis**

Radcliffe Marine, Inc.					
Belhaven, North Carolina					
Triangle Proj. No. 676-0109	Current Assessment Data				
Sample I.D.	GP-2	GP-4-1	GP-4-2-4	GP-6	
Sample Date	10/28/96	10/28/96	10/28/96	10/28/96	
Sample Depth	1'	1'	2.4'	1.5'	
Method SW-846 8260 (mg/kg)					
Acetone	<0.062	<0.057	<0.28	<0.058	
Benzene 0.0056	<0.006	<0.006	<0.28	<0.006	
N-Butylbenzene 4	<0.006	<0.006	0.037 37	<0.006	
Sec-Butylbenzene 3	<0.006	<0.006	0.056 56	<0.006	
Ethylbenzene 0.24	<0.006	<0.006	0.9 900	<0.006	
Isopropylbenzene 2	<0.006	<0.006	0.032 32	<0.006	
P-Isopropylbenzene 0.37	<0.006	<0.006	0.053 53	<0.006	
Napthalene 0.58	<0.006	<0.006	0.97 970	<0.006	
N-Propylbenzene 2	<0.006	<0.006	0.12 120	<0.006	
Toluene 7	<0.006	<0.006	<0.28	<0.006	
1,2,4-Trimethylbenzene 8	<0.006	<0.006	1.2 1200	<0.006	
1,3,5-Trimethylbenzene 7	<0.006	<0.006	0.034 34	<0.006	
Xylenes 5	<0.006	<0.006	<0.28	<0.006	

ppm

Table 1  
Laboratory Data Summary - Soil Analysis

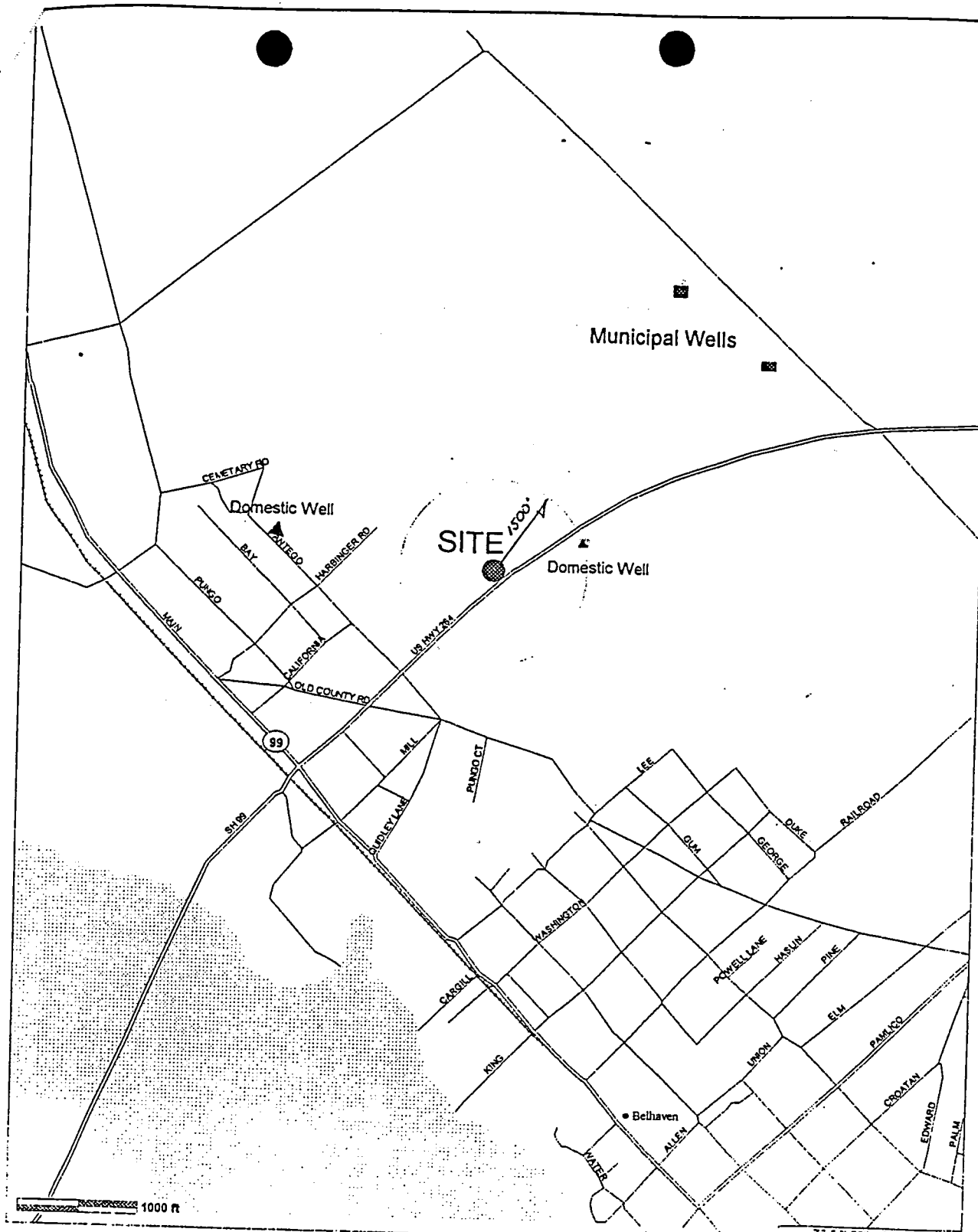
Radcliffe Marine, Inc.								
Belhaven, North Carolina								
Triangle Proj. No. 676-0109	Previous Assessment Data							
Sample I.D.	BH 1-1	BH 1-2	BH 2-1	BH 5-1	BH 6-1	BH 7-1	BH 7-2	BH 9-2
Sample Date	5/2/95	5/2/95	5/2/95	5/2/95	5/2/95	5/2/95	5/2/95	5/2/95
Sample Depth	0.5'	1.5'	0.5'	0.5'	0.5'	0.5'	1.5'	1.5'
Method SW-846 8260 (mg/kg)								
Acetone	7.9	2.9	<5.0	<5.0	6.2	<1.0	<1.0	<1.0
Benzene 0.0056	<0.005	0.014	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
N-Butylbenzene 4	NA	NA	NA	NA	NA	NA	NA	NA
Sec-Butylbenzene 3	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene 0.24	0.45	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Isopropylbenzene 2	NA	NA	NA	NA	NA	NA	NA	NA
P-Isopropylbenzene 0.37	NA	NA	NA	NA	NA	NA	NA	NA
Napthalene 0.58	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
N-Propylbenzene 2	NA	NA	NA	NA	NA	NA	NA	NA
Toluene 7	0.007	0.099	<0.005	0.007	<0.005	<0.005	<0.005	<0.005
1,2,4-Trimethylbenzene 8	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzene 7	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes 5	0.047	0.670	0.007	0.035	<0.005	<0.005	<0.005	<0.005
	Note: Depths are assumed. Analytical method 8240							

**Table 1**  
**Laboratory Data Summary - Soil Analysis**

<b>Radcliffe Marine, Inc.</b>							
<b>Belhaven, North Carolina</b>							
<b>Triangle Proj. No. 676-0109</b>	<b>Previous Assessment Data</b>						
Sample I.D.	BH 10-1	BH 11-1	BH 12-1	BH 13-1	BH 15-1	BH 16-1	BH 17-1
Sample Date	5/2/95	5/2/95	5/2/95	5/2/95	5/2/95	5/2/95	5/2/95
Sample Depth	0.5'	0.5'	0.5'	0.5'	0.5'	0.5'	0.5'
<b>Method SW-846 8260 (mg/kg)</b>							
Acetone	<1.0	<1.0	<1.0	<1.0	<1.0	7.9	<1.0
Benzene	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
N-Butylbenzene	NA	NA	NA	NA	NA	NA	NA
Sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA
P-Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA
Napthalene	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
N-Propylbenzene	NA	NA	NA	NA	NA	NA	NA
Toluene	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA
Xylenes	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
	<b>Note: Depths are assumed. Analytical method 8240</b>						

Table 2  
Laboratory Data Summary - Groundwater Analysis

Radcliffe Marine, Inc.									
Belhaven, North Carolina							Matrix: Water		
Triangle Proj. No. 676-0109									
Sample I.D.		GP-2	GP-3	GP-4	GP-9*	GP-5	GP-6	GP-7	GW
Sample Date		10/28/96	10/28/96	10/28/96	10/28/96	10/28/96	10/28/96	10/28/96	Standards
Method SW-846 8260 (µg/L)									
Acetone		<50	<50	<1000	<1000	<250	<50	<50	700
Benzene		<5.0	<5.0	<100	<100	31	<5.0	<5.0	1
Ethylbenzene		<5.0	<5.0	3,200	2,800	450	<5.0	<5.0	29
Toluene		<5.0	<5.0	<100	<100	36	<5.0	<5.0	1000
Xylenes		<5.0	<5.0	710	550	130	<5.0	<5.0	530
MTBE		21	<5.0	<100	<100	<25	<5.0	<5.0	200
1,2,4-Trimethylbenzene		<5.0	<5.0	240	180	66	<5.0	<5.0	NL
1,3,5-Trimethylbenzene		<5.0	<5.0	<100	<100	26	<5.0	<5.0	NL
Naphthalene		5.0	<5.0	<100	<100	<25	<5.0	<5.0	21
								NL - Not Listed	
* - GP-9 is a duplicate of GP-4									



Precision Mapping, Copyright 1995,98, Just Softworks Inc., Portions Copyright 1992-1998 TRIUS, Inc.



TRIANGLE  
ENVIRONMENTAL  
INC.  
P.O. Box 41087  
Raleigh, N.C. 27629  
(919) 875-5115  
(800) 849-5115  
(919) 799-8273 fax

PROJECT:

Radcliffe Marine Sales, Inc.  
Site Location Map w/ Groundwater Receptors

PROJ. #

676-0109

DRAWN BY:

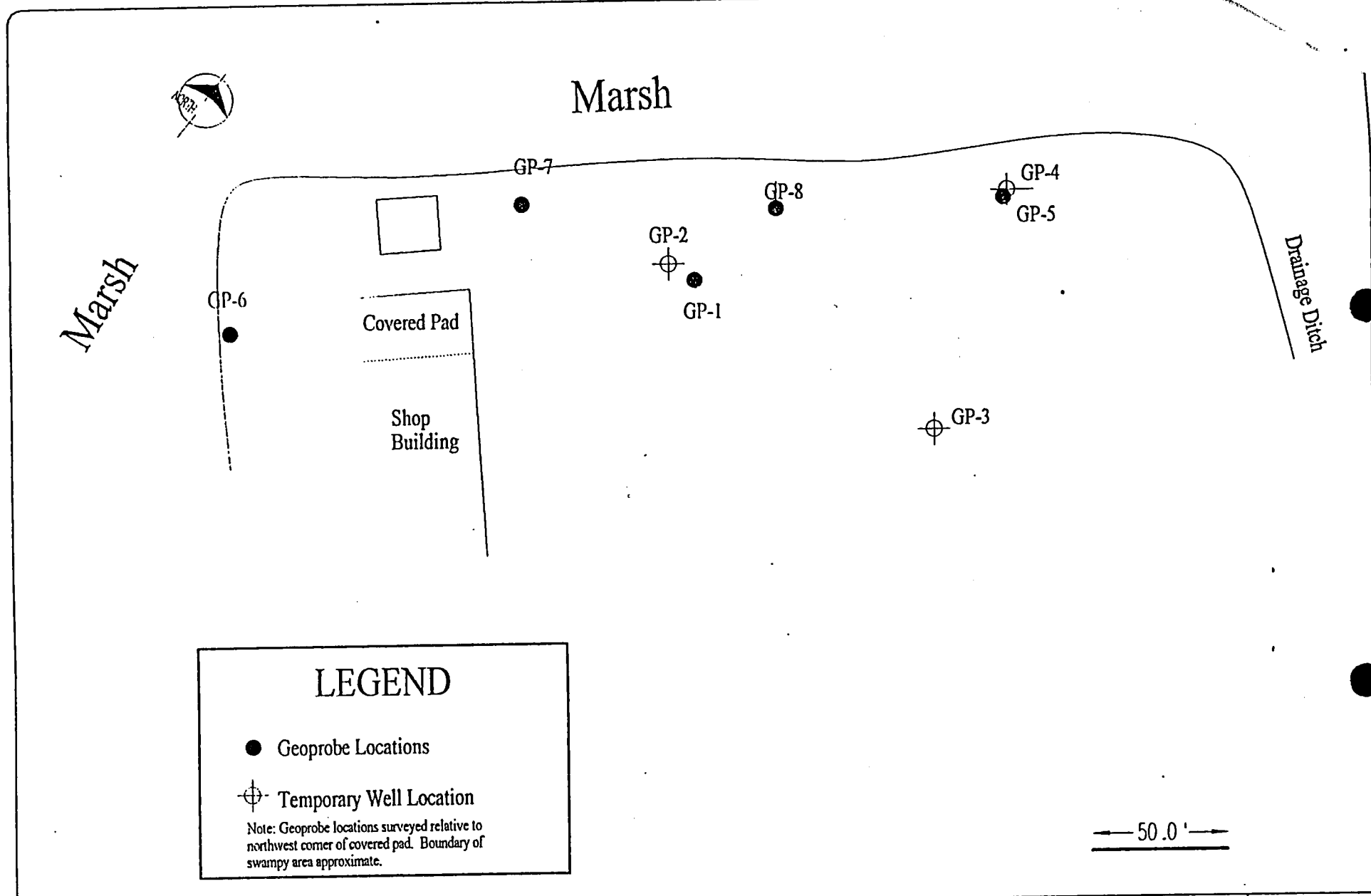
JAH


SCALE:

as shown

FIGURE:

1a




**TRIANGLE ENVIRONMENTAL INC.**  
 P.O. Box 41037  
 Raleigh, N.C. 27629  
 (919) 876-5115  
 (800) 849-5115  
 (919) 790-8273 fax

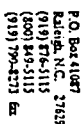
PROJECT:

# Radcliffe Marine Sales, Inc. Site Map

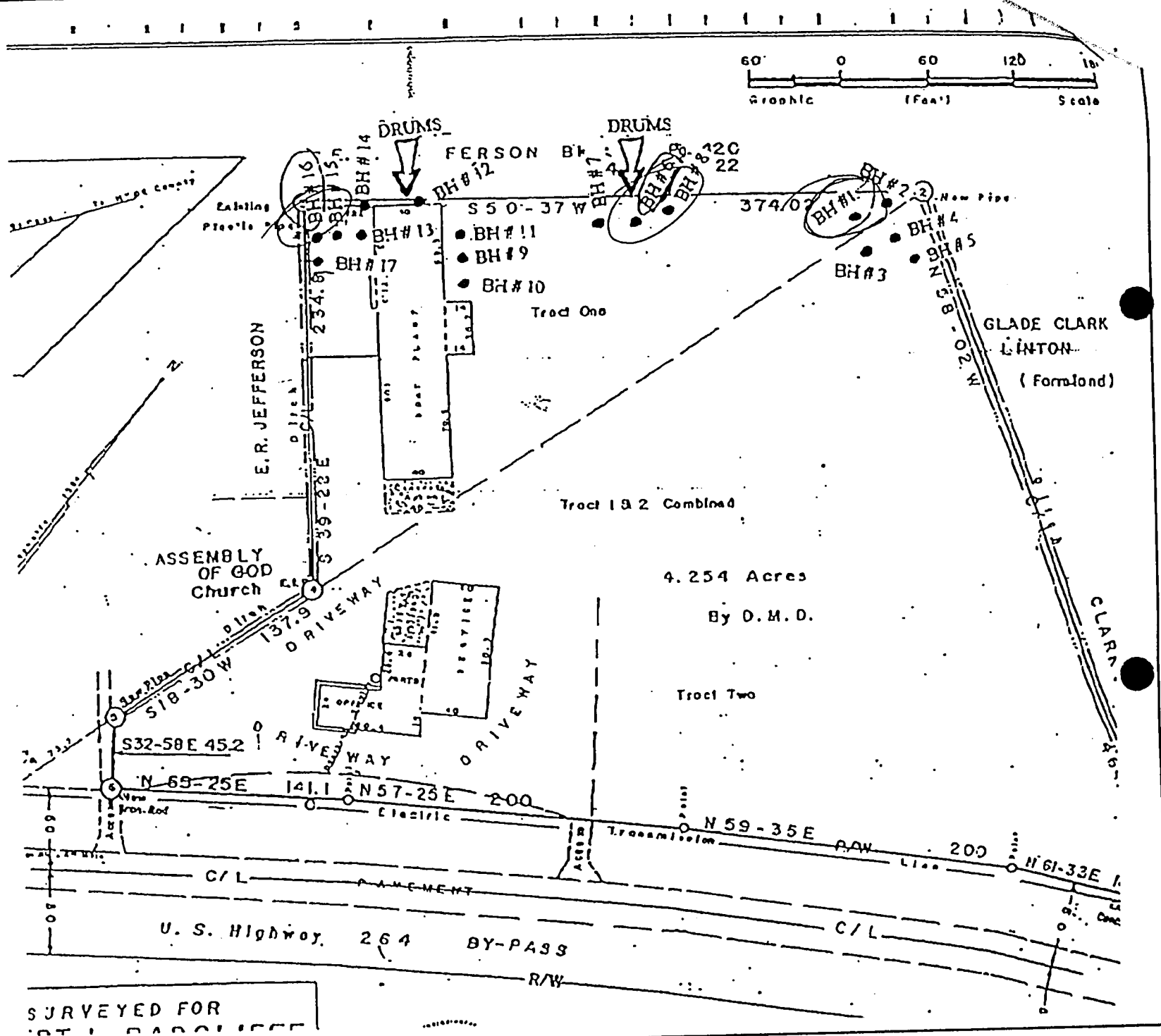
PROJ. #  
 676-0109  
 DRAWN BY:  
 JAH  
 SCALE:  
 1" = 50'

FIGURE:

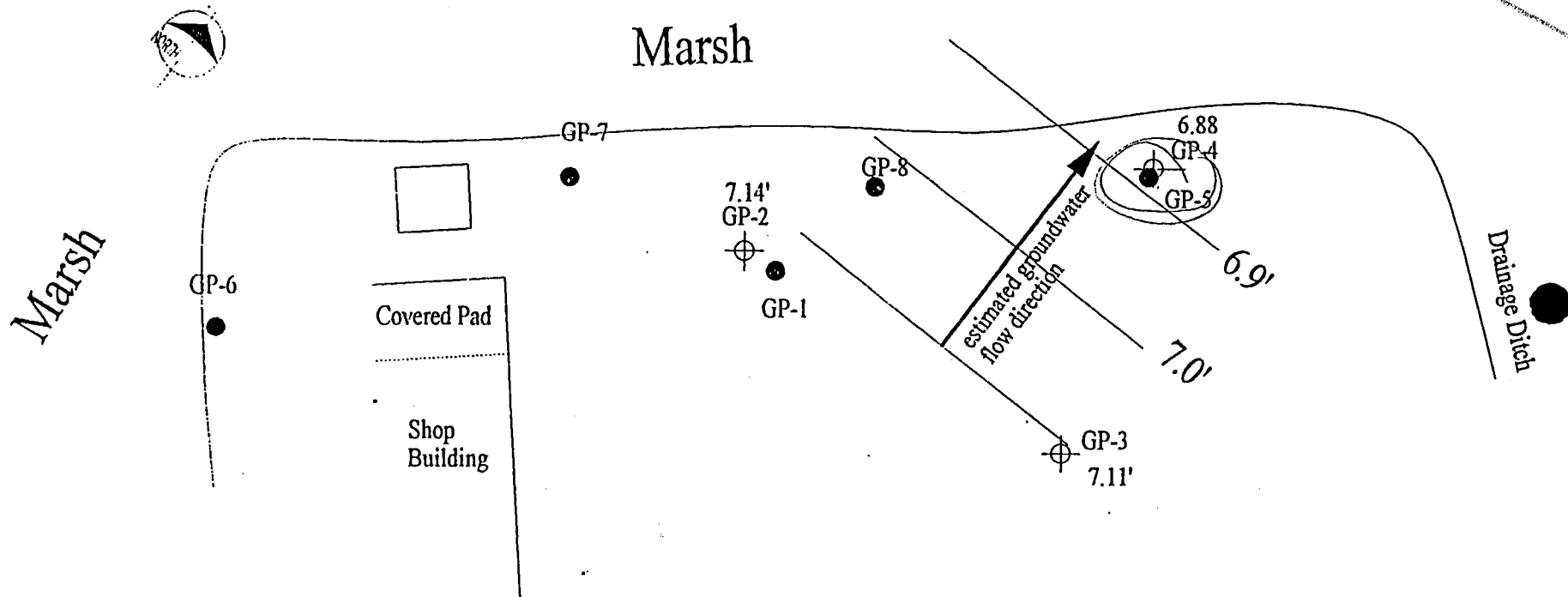
2



as shown







## LEGEND

● Geoprobe Locations

⊕ Temporary Well Location

Note: Geoprobe locations surveyed relative to northwest corner of covered pad. Boundary of swampy area approximate.

50.0'



TRIANGLE  
ENVIRONMENTAL  
INC.  
P.O. Box 41087  
Raleigh, N.C. 27629  
(919) 876-5115  
(800) 849-5115  
(919) 790-5273 fax

PROJECT:

Radcliffe Marine Sales, Inc.  
Water Table Map (10/28/96)

PROJ. /  
676-0109  
DRAWN BY:  
JAH  
SCALE:  
1" = 50'

FIGURE:

4

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO	0163
DESTINATION TEL #	912523216094
DESTINATION ID	
ST. TIME	04/18 08:51
TIME USE	05'44
PAGES SENT	15
RESULT	OK



## North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor  
William G. Ross Jr., Secretary

Division of Waste Management  
Underground Storage Tank Section

Dexter R. Matthews, Director

### FAX

TO: Justin Radcliff

COMPANY: GRI

FAX No.: 252-321-6094

FORM: Rose Ballance, Division of Waste Management UST Section  
Washington Regional Office *RB*

DATE: April 18, 2008

Data for Radcliffe Marine (Privateer)

No. of Pages:

*15*

Spoke with Mr. Radcliffe.

4-16-08

Says he's hiring

consultant. RB told  
him only 1 boring/water  
sample required in  
area of contamination

UNITED STATES POSTAL SERVICE



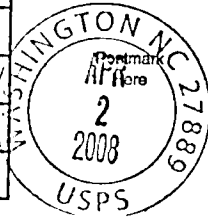
First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

North Carolina Department of  
Environment & Natural Resources  
UST Section  
943 Washington Square Mall  
Washington, North Carolina 27889

7007 0220 0003 1479 2145

<b>U.S. Postal Service</b> <b>CERTIFIED MAIL RECEIPT</b> (Domestic Mail Only, No Insurance Coverage Provided)	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage	\$ .41
Certified Fee	2.65
Return Receipt Fee (Endorsement Required)	2.15
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$5.21
Sent To Street, Apt. # or PO Box No. MR GILBERT RADCLIFFE City, State, Z. RADCLIFFE MARINE SALES INC PO BOX 57 BELHAVEN NC 27810	

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

MR GILBERT RADCLIFFE  
 RADCLIFFE MARINE SALES INC  
 PO BOX 57  
 BELHAVEN NC 27810

**2. Article Number**

Transfer from service label

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature *[Signature]* ☒ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery  
 4/3/08

D. Is delivery address different from item 1? ☐ Yes  
 If YES, enter delivery address below: ☐ No

Received  
 Waro DW!!!

APR 09 2008

**3. Service Type**

- ☒ Certified Mail ☐ Express Mail  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor  
William G. Ross Jr., Secretary

Division of Waste Management  
Underground Storage Tank Section

Dexter R. Matthews, Director

April 2, 2008

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
**7007 0220 0003 1479 2145**

Mr. Gilbert Radcliffe  
Radcliffe Marine Sales, Inc.  
P.O. Box 57  
Belhaven, NC 27810

Re: Recommendation for Enforcement Action  
Radcliffe Marine, Inc. Facility  
Highway 264  
Belhaven, Beaufort County  
Incident No.: 85050  
Risk/Ranking: Low 120 D

Dear Mr. Radcliffe:

This letter is to notify you that this office is considering recommending enforcement action to the Director of the Division of Waste Management. The recommendation for enforcement concerns the violation(s) cited in the Notice of Violation (NOV) sent to you on April 23, 2007, specifically

- Failure to submit a report documenting the results of a site assessment, to be conducted at the above referenced facility to determine if soil and/or groundwater contamination still exist at the site. This assessment was originally requested by the Division of Water Quality Aquifer Protection Section in a letter dated August 5, 2005. A report documenting the results of the assessment was to have been submitted within sixty days of receipt of that letter. As of today, the requested report has not been received.

If there is an explanation for the violation(s) cited, or if you believe there are other factors which should be considered, please submit your response to me in writing **within 10 days of receipt** of this notice. Your explanation will be reviewed, and if enforcement action is still deemed appropriate, your explanation will be forwarded to the Director with the enforcement package for his consideration.

If you have any questions concerning this matter, please contact me at 252-948-3906 or at the address or phone number listed below.

Sincerely,

Scott Bullock, LG.  
Regional Supervisor  
Washington Regional Office

cc: Beaufort County Health Department

943 Washington Square Mall, Washington, NC 27889 (252) 946-6481

**NORTH CAROLINA  
UNDERGROUND STORAGE TANK SECTION  
RISK, RANK AND ABATEMENT RATING FORM**

Incident Name: Radcliffe Marine Region: WACO  
Incident Number: 85050 County: Beaufort SCORE  
Date: 8/22/07 Ranking Performed by: Scott Bullard L/200

*Note: a new ranking form must be completed whenever site conditions may have changed*

**SECTION I. Risk Classification (Check all that apply)**

**1. High Risk**

- A. An existing water supply well, including one used for non-drinking purposes, has been contaminated by the release; \_\_\_\_\_
- B. A water supply well used for drinking water is located within 1,000 feet of the source area of a confirmed release; >1500' \_\_\_\_\_
- C. A water supply well not used for drinking water is located within 250 feet of the source area of a confirmed release; \_\_\_\_\_
- D. The groundwater within 500 feet of the source area of a confirmed release has the potential for future use in that there is no source of water supply other than the groundwater; \_\_\_\_\_
- E. There exists a serious threat of explosion due to the accumulation of vapors in a confined space, as a result of the release; or \_\_\_\_\_
- F. There exists an imminent danger to public health, public safety or the environment, as a result of the release. \_\_\_\_\_

**2. Intermediate Risk**

- A. Surface water is located within 500 feet of the source area of a confirmed release and the maximum groundwater contaminant concentration exceeds the applicable surface water quality standard and criteria found in 15A NCAC 2B .0200 by a factor of 10; < 10X SW ✓
- B. In the Coastal Plain Physiographic Province (as designated on a map entitled Geologic Map of North Carolina published by the Department in 1985), the source area of a confirmed release is located where there is recharge to an unconfined or semi-confined deeper aquifer which the Department determines is being used or may be used as a source of drinking water; ✓
- C. The source area of a confirmed release is located within a designated wellhead protection area, as defined in 42 USC 300h-7(e); < Gross \_\_\_\_\_
- D. The levels of groundwater contamination for any contaminant (except ethylene dibromide, benzene and the aliphatic and aromatic carbon fraction classes) exceed 50 percent of the solubility of the contaminant at 25 degrees Celsius or 1,000 times the groundwater quality standard or interim standard established in 15A NCAC 2L .0202, whichever is lower (these levels have been termed "gross contamination levels"); or \_\_\_\_\_
- E. The levels of groundwater contamination for ethylene dibromide or benzene exceed 1,000 times the federal drinking water standard set out in 40 CFR 141 (these levels have also been termed "gross contamination levels"). \_\_\_\_\_

**3. Low Risk**

- A. A low risk classification means that the risk posed by a release does not meet any of the high or intermediate risk criteria or, based on site-specific information received by the Department, the release does not pose a significant risk. ✓

**SECTION I. Risk Classification**

Low

## SECTION II. Release Ranking (Assign points as applicable)

### 1. EMERGENCY HAZARD ASSESSMENT

An emergency situation exists whenever the Department determines that the release poses an imminent danger to public health, public safety, or the environment.

POINTS

EMERGENCY

Complete entire form and assign letter E to final rating in Section III, Once Emergency is abated a new rating must be performed

### 2. EXPOSURE ASSESSMENT

#### Groundwater

##### A. Impacted Water Supplies

Public Supply Wells (each well can only be counted once)

1. Public or institutional water supply well containing substances in concentrations exceeding 15A NCAC 2L groundwater quality standards; award 600 points per well

0

Private Supply Wells (each well can only be counted once)

2. Private domestic drinking water supply well containing substances in concentrations exceeding 15A NCAC 2L groundwater quality standards; award 200 points per well

0

3. Private well, not used for drinking, containing contamination in detectable concentrations; award 75 points per well

0

Public or Private Wells Below 2L .0202 Standards (each well can only be counted once)

4. Public or private drinking water supply contains substances that are below the 15A NCAC 2L groundwater quality standards; award 100 points per well

0

##### B. Threat to Uncontaminated Drinking Water Supplies

Public Supply Wells (each well can only be counted once)

1. Public or institutional water supply well within 500 ft of plume edge, plume edge is within radius of influence of public well, or threat currently unknown; award 40 points per well

0

2. Public or institutional water supply well between 500 and 1000 ft of plume edge or threat is reasonably known; award 10 points per well

0

Private Supply Wells (each well can only be counted once)

3. Private water supply, including non-drinking well, located within 250 feet of plume edge, wells threatened or the threat is currently unknown; award 20 points per well

0

4. Private water supply, not including non-drinking well, located between 251 and 500 feet of the plume edge, wells threatened or the threat is currently unknown; award 10 points per well

0

5. Private water supply, not including non-drinking well, located between 501 and 1000 feet of plume edge or wells located within 1000 feet but threat to wells is reasonably known or alternate water source is available; award 5 points per well

0

6. Private non-drinking well, located between 251 and 1000 feet of plume edge; award 2 points per well

0

2 wells Public 23500' 1 Domestic well 1500'  
One Domestic well  
~ 2500'

#### Surface Water

1. Violation of Class HQW, ORW, WS-I, WS-II or SA surface water quality standards as a result of groundwater discharge; award 10 points

0

2. Free product or sheen discovered on surface waters as a result of groundwater discharge; award 5 points

0



# Soil

A. Land Use Choose required soil clean-up level then apply points only if soil contamination exceeds requirement

No Risk Data

Soil to GW

Residential

Industrial/Commercial



*No Air data for MADEP  
> Residential for individual constituents*

1. Maximum soil contaminant concentration exceeds "Soil to Groundwater" but below "Residential" exposure concentration; award 5 points total  
OR
2. Maximum soil contaminant concentration exceeds "Residential" but is below the "Industrial/Commercial" exposure concentration; award 10 points total  
OR
3. Maximum soil contaminant concentration exceeds the "Industrial/Commercial" exposure concentration or no risk-based data available; award 15 points total

0

0

15

## Air

A. Vapor Phase Exposure

1. Contaminant vapors detected in inhabitable building(s), but levels are below 20% of the lower explosive limit and health concern levels; award 20 points total
2. Contaminant vapors detected in other confined areas (uninhabitable buildings, sewer lines, utility vaults, etc.) but levels are below 20% of the lower explosive limit; award 5 points total

0

0

## 3. HYDROGEOLOGY AND LITHOLOGY

A. Bedrock - contamination is located in, on or within five feet of bedrock; award 20 points

B. Vertical Contaminant Migration - Literature or well logs indicate that no confining layer is present above bedrock or within twenty feet of land surface; award 10 points

C. Horizontal Contaminant Migration - Data or observations indicate that no discharge points or aquifer discontinuities exist between the discharge, release or known extent of contamination and the nearest down gradient drinking water supply; award 5 points total

0

10

5

## 4. ENVIRONMENTAL VULNERABILITY ASSESSMENT

### Contamination Concentrations

A. Existing Groundwater Quality - The worst case monitor or supply well, assign only one

1. At less than 10 times the 2L groundwater standards; award 5 points  
OR
2. Between 10 and 100 times the 2L groundwater standards; award 20 points  
OR
3. Greater than 100 times the 2L groundwater standards; award 40 points  
OR
4. Free Product; award 80 points

*Benzene 31 ppb*

0

20

0

*Ethylbenzene 3200 ppb*

0

### Contaminant Types

A. Predominant Contamination Type

1. Low boiling point petroleum products (gasoline, aviation fuel); award 20 points
2. High boiling point petroleum products (fuel oil, kerosene, diesel fuel or similar products); award 0 points

20

0

## SECTION II. Release Ranking

70

### SECTION III. Source Abatement Assignment (Award Points and Assign Letter)

#### A. Abated or Unabated Contaminant Source

1. Emergency Situation, Assign Letter E (from Section II.1.)  
OR
2. UST remains in active use and continues to discharge into the environment; Award 100 points and assign Letter A  
OR
3. UST release has been abated. However, contaminated soil continues to release product or contaminants into the environment; Award 50 points and assign Letter D  
OR
4. UST release has been abated. Contaminated soil has been removed or remediated; Award 0 points and assign Letter R

500

500

### SECTION III. Source Abatement Assignment

### SECTION IV. Risk, Rank and Abatement Score

#### Total: Risk, Rank and Abatement Score

(Insert risk letter from Section I, total all points from Section II and III, and insert abatement letter from Section III)

L120D  
(e.g H750D)

Upon completion transfer final score to box on page 1.

**RADCLIFFE MARINE SALES & SERVICE  
P. O. BOX 57  
831 HWY 264 BYPASS  
BELHAVEN, N. C. 27810  
252-943-3731**

May 8, 2007

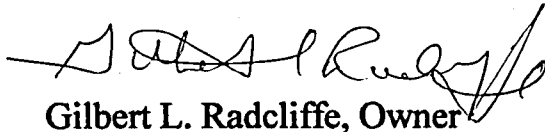
NCDENR  
Attn: Rose Balance  
Div of Waste Management  
943 Washington Square Mall  
Washington, N. C. 27889

Incident No. 85050

Rose:

We have contacted several Environmental Consulting Companies but no one has let us know when they can perform the necessary tests. I will advise you just as soon as I hear from one.

Thank you for your assistance in this matter.

  
Gilbert L. Radcliffe, Owner

Received  
Ward DWM  
MAY 14 2007

**Privateer Boat Co.**

Hwy. 264 By-Pass - P.O. Box 57  
Belhaven, North Carolina 27810

ROCKY MOUNT  
NC 278 1 L  
10 MAY 2007 PM



NC DENR  
Attn: Rose Calance  
Div of Waste Management  
943 Washington Square Mall  
Washington NC 27889



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor  
William G. Ross Jr., Secretary

Division of Waste Management  
Underground Storage Tank Section

Dexter R. Matthews, Director

FAX

TO: Mr. Radcliffe  
Radcliffe Marine

FROM: Rose Ballance *RB*

DATE: April 30, 2007

Fax No.: 252-943-3010

---

Mr. Radcliffe,

Per our earlier conversation, attached are the following:

- List of consultants in this area (you may wish to look up additional ones in the Yellow Pages).
- A drawing from the 1996 report showing the area where soil and groundwater exceedances were detected (area is circled).
- Tables from the 1996 report showing soil and groundwater data.

If you need additional information, please do not hesitate to call me at 252-948-3949.  
Thank you.

## Environmental Consulting Companies

Allied Environmental Services  
2411 A South Charles St.  
Greenville, NC 27858  
(252) 758-3311

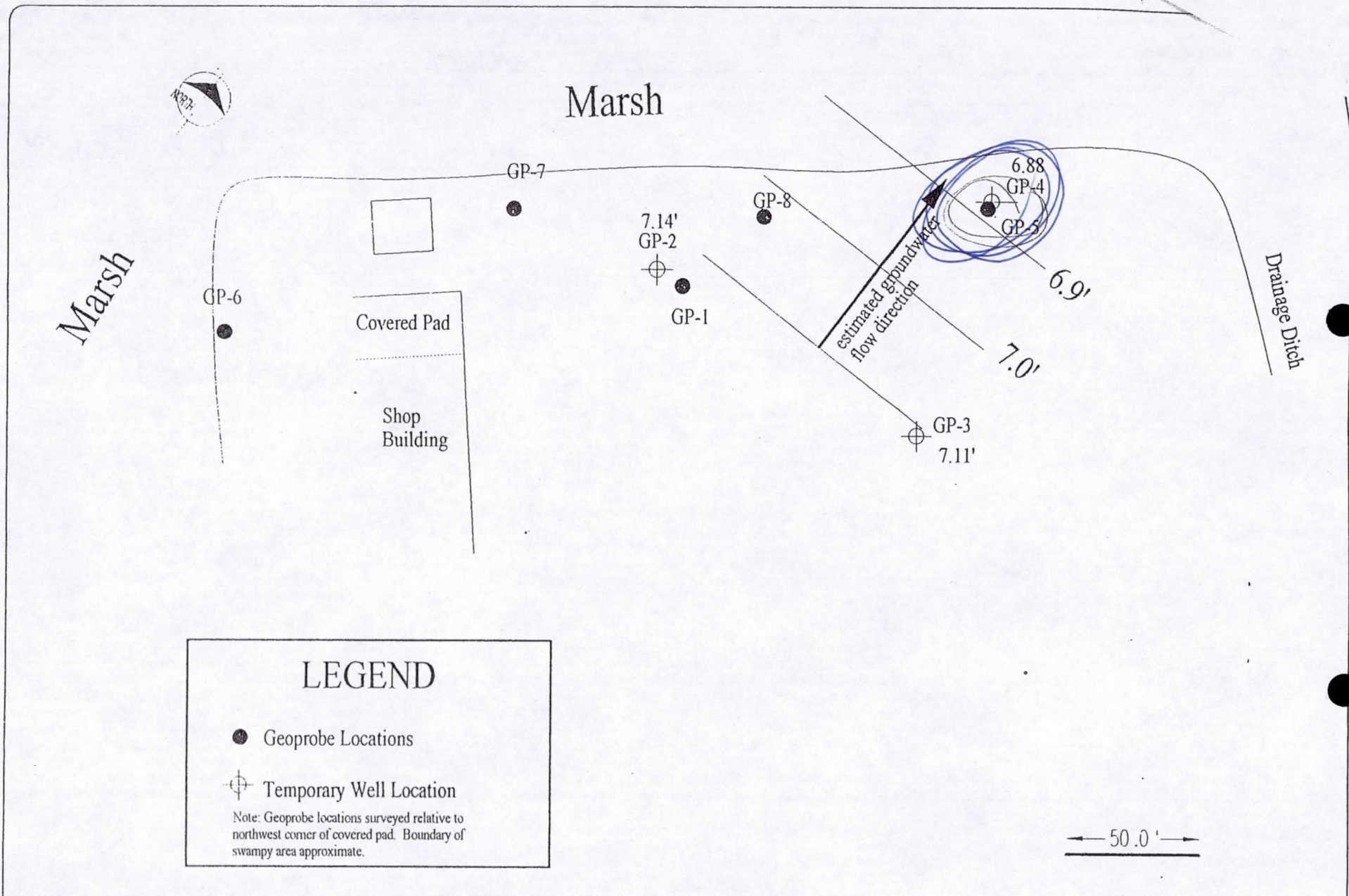
Avolis Engineering  
P.O. Box 15564  
New Bern, NC 28561  
(252) 633-0068

CBM Environmental Services  
1411 B South Evans St.  
Greenville, NC 27858  
(252) 752-0200

Fuss & O'Neill  
610 Lynndale Ct.  
Suite E  
Greenville, NC 27858  
(252) 355-1370

GMA, Groundwater Management Assoc.  
2025 E. Eastgate Drive  
Greenville, NC 27834  
(252) 758-3310

P & F Environmental  
4352 N. Old Carriage Rd.  
Rocky Mt., NC 27804  
(252) 443-4083




**TRIANGLE ENVIRONMENTAL INC.**  
 P.O. Box 41087  
 Raleigh, N.C. 27629  
 (919) 876-5115  
 (800) 849-5115  
 (919) 790-8273 fax

PROJECT:

Radcliffe Marine Sales, Inc.  
 Water Table Map (10/28/96)

PROJ. #  
 676-0109  
 DRAWN BY:  
 JAH  
 SCALE:  
 1" = 50'

FIGURE:

4

Table 2  
Laboratory Data Summary - Groundwater Analysis

Radcliffe Marine, Inc.									
Belhaven, North Carolina						Matrix: Water			
Triangle Proj. No. 676-0109									
	Sample I.D.	GP-2	GP-3	GP-4	GP-9*	GP-5	GP-6	GP-7	GW
	Sample Date	10/28/96	10/28/96	10/28/96	10/28/96	10/28/96	10/28/96	10/28/96	Standards
Method SW-846 8260 (µg/L)									
	Acetone	<50	<50	<1000	<1000	<250	<50	<50	700
	Benzene	<5.0	<5.0	<100	<100	<del>31</del>	<5.0	<5.0	1
	Ethylbenzene	<5.0	<5.0	<del>3,200</del>	<del>2,800</del>	<del>450</del>	<5.0	<5.0	29
	Toluene	<5.0	<5.0	<100	<100	36	<5.0	<5.0	1000
	Xylenes	<5.0	<5.0	<del>710</del>	<del>550</del>	130	<5.0	<5.0	530
	MTBE	21	<5.0	<100	<100	<25	<5.0	<5.0	200
	1,2,4-Trimethylbenzene	<5.0	<5.0	<del>240</del>	<del>180</del>	<del>66</del>	<5.0	<5.0	NL
	1,3,5-Trimethylbenzene	<5.0	<5.0	<100	<100	<del>26</del>	<5.0	<5.0	NL
	Naphthalene	5.0	<5.0	<100	<100	<25	<5.0	<5.0	21
								NL - Not Listed	
	* - GP-9 is a duplicate of GP-4								



Table 1  
Laboratory Data Summary - Soil Analysis

Radcliffe Marine, Inc.					
Belhaven, North Carolina					
Triangle Proj. No. 676-0109	Current Assessment Data				
Sample I.D.	GP-2	GP-4-1	GP-4-2-4	GP-6	
Sample Date	10/28/96	10/28/96	10/28/96	10/28/96	
Sample Depth	1'	1'	2.4'	1.5'	
Method SW-846 8260 (mg/kg)					
Acetone	<0.062	<0.057	<0.28	<0.058	
Benzene 0.0056	<0.006	<0.006	<0.28	<0.006	
N-Butylbenzene 4	<0.006	<0.006	0.037 37	<0.006	
Sec-Butylbenzene 3	<0.006	<0.006	0.056 56	<0.006	
Ethylbenzene 0.24	<0.006	<0.006	0.9 900	<0.006	
Isopropylbenzene 2	<0.006	<0.006	0.032 32	<0.006	
P-Isopropylbenzene 0.37	<0.006	<0.006	0.053 53	<0.006	
Napthalene 0.58	<0.006	<0.006	0.97 970	<0.006	
N-Propylbenzene 2	<0.006	<0.006	0.12 120	<0.006	
Toluene 7	<0.006	<0.006	<0.28	<0.006	
1,2,4-Trimethylbenzene 8	<0.006	<0.006	1.2 1200	<0.006	
1,3,5-Trimethylbenzene 7	<0.006	<0.006	0.034 34	<0.006	
Xylenes 5	<0.006	<0.006	<0.28	<0.006	

ppm

TRANSMISSION VERIFICATION REPORT

TIME : 04/30/2007 18:00

DATE, TIME  
FAX NO./NAME  
DURATION  
PAGE(S)  
RESULT  
MODE

04/30 17:59  
99433010  
00:00:36  
01  
OK  
STANDARD

UNITED STATES POSTAL SERVICE

ROCKY MOUNT

NC 278 17

25 APR 2007 PM

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

**S. Bullock**

NC DEPARTMENT OF ENVIRONMENT &  
NATURAL RESOURCES

DWM- UST Section

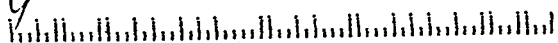
943 Washington Square Mall

Washington, NC 27889

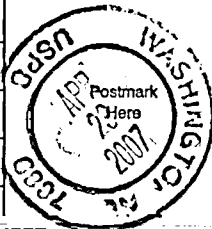


4664

712



7005 1820 0002 4630 8073

<b>U.S. Postal Service</b> <i>UST IRB</i> <b>CERTIFIED MAIL RECEIPT</b> <i>Domestic Mail Only, No Insurance Coverage Provided</i>	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage	\$ <i>0.39</i>
Certified Fee	<i>2.40</i>
Return Receipt Fee (Endorsement Required)	<i>1.85</i>
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	<i>\$4.64</i>
Sent To	MR GILBERT RADCLIFFE
	RADCLIFFE MARING SALES
	RADCLIFFE MARINE SALES INC
Street, Apt. No., or PO Box No.	PO BOX 57
City, State, ZIP+4	BELHAVEN NC 27810
	

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

MR GILBERT RADCLIFFE  
 RADCLIFFE MARING SALES  
 RADCLIFFE MARINE SALES INC  
 PO BOX 57  
 BELHAVEN NC 27810

## 2. Article Number

(Transfer from service label)

7005 1820 0002 4630 8073

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

X *Max*☐ Agent☒ Addressee

## B. Received by (Printed Name)

*Max*

## C. Date of Delivery

*4-24-07*

## D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

Received  
 Waro DWM

## 3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

## 4. Restricted Delivery? (Extra Fee)

☐ Yes



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor  
William G. Ross Jr., Secretary

Division of Waste Management  
Underground Storage Tank Section

Dexter R. Matthews, Director

April 23, 2007

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
7005 1820 0002 4630 8073

Mr. Gilbert Radcliffe  
Radcliffe Marine Sales, Inc.  
P.O. Box 57  
Belhaven, NC 27810

Re: **Notice of Violation**  
15A NCAC 2L Classifications  
and Water Quality Standards  
Radcliffe Marine, Inc. Facility  
Highway 264  
Belhaven, Beaufort County  
Incident No.: 85050

Dear Mr. Radcliffe:

Based upon information presented in the *Soil and Groundwater Investigation Report* submitted in December 1996 by your consultant Triangle Environmental, Inc., the Division of Waste Management has reason to believe that you are responsible for activities resulting in noncompliance with North Carolina law. Assessments conducted in 1995 and 1996 discovered contamination of soil and groundwater by petroleum hydrocarbons at the above referenced facility. The reported constituent concentrations exceed those standards for CLASS GA waters, which are those fresh groundwaters as established in 15A NCAC 2L .0202 (g).

In a letter dated August 5, 2005, the Division of Water Quality Aquifer Protection Section requested that you reassess the site to determine if soil and/or groundwater contamination still exist at the site. A report documenting the results of the assessment was to have been submitted within sixty days of receipt of that notice. As of today, the requested report has not been received.

Due to these violations, you are required to take the following actions in accordance with applicable provisions in 15A NCAC 2L .0106 (c):

1. Take immediate action to eliminate the source or sources of contamination;
2. Submit a site assessment report to the Washington Regional Office assessing the cause, significance and extent of the violation; and
3. Implement an approved corrective action plan for restoration of groundwater quality in accordance with a schedule established by the Director, or his designee. In establishing a schedule, the Director or designee shall consider any reasonable schedule proposed by the person submitting the plan. A report shall be made to the Health Director of the county or counties in which the contamination occurs in accordance with the requirements of Rule .0114(a) in this section.

The assessment is required by 15A NCAC 2L .0106(g) and shall address the following:

1. The source and cause of contamination;
2. Any imminent hazards to public health and safety and actions taken to mitigate them in accordance with Paragraph (f) of this Rule;
3. All receptors and significant exposure pathways;
4. The horizontal and vertical extent of soil and groundwater contamination and all significant factors affecting contaminant transport; and
5. Geological and hydrogeological features influencing the movement, chemical, and physical character of the contaminants.

The assessment must be conducted under the supervision of a Professional Engineer (P.E.) or Licensed Geologist (L.G.). The subsequent report must be signed and sealed by a P.E. or L.G. For information on available consultants and engineers, you may contact the Consulting Engineers Council of North Carolina at (919) 781-7934, or the North Carolina Board for Licensing of Geologist at (919) 850-9669, or the North Carolina Petroleum Marketers Association at (919) 782-4411.

The assessment report must be submitted to the Washington Regional Office within **ninety (90) days** of receiving this letter. Failure to submit the required reports or failure to expeditiously eliminate the contaminant source and restore groundwater quality in the affected area may result in the recommendation of enforcement action. Fines may be imposed under NCGS 143-215.6A(a)(1) of not more than \$10,000 per violation of any classification, standard, limitation or management practice established pursuant to G.S. 143-214.1. Additional action may include the issuance of a special order against you under the authority of G.S. 143-215.2; or a request to the Attorney General to institute an action for injunctive relief. If any failure to act is continuous, penalties may be assessed not to exceed a maximum penalty of \$10,000 per day per violation under NCGS 143-215.6A(b) so long as the violation continues.

We request that you respond to this notice, in writing, within fifteen (15) working days from its receipt. In your response, please confirm your intent to comply with the above requirements by specifying the actions you plan to undertake to correct the violations and by submitting a proposed schedule for accomplishing these actions.

We appreciate your attention and prompt response in this matter. If you have questions, please do not hesitate to call Rosemarie Ballance at (252) 948-3949 or at the address listed below.

Sincerely,



Scott Bullock, L.G.  
Regional Supervisor  
Washington Regional Office

cc: Beaufort County Health Department  
✓ WaRO

**UST Regional Offices:**

**Asheville (ARO)** – 2090 US Highway 70, Swannanoa, NC 28778 (828) 296-4500

**Fayetteville (FAY)** – 225 Green Street, Suite 714, Systel Building, Fayetteville, NC 28301 (910) 433-3300

**Mooresville (MOR)** – 610 East Center Avenue, Suite 301, Mooresville, NC 28115 (704) 663-1699

**Raleigh (RRO)** – 1628 Mail Service Center, Raleigh, NC 27699 (919) 791-4200

**Washington (WAS)** – 943 Washington Square Mall, Washington, NC 27889 (252) 946-6481

**Wilmington (WIL)** – 127 Cardinal Drive Extension, Wilmington, NC 28405 (910) 796-7215

**Winston-Salem (WS)** – 585 Waughtown Street, Winston-Salem, NC 27107 (336) 771-5000

**Gulford County Environmental Health**, 1203 Maple Street, Greensboro, NC 27405, (336) 641-3771

*A Harris*  
UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10.

• Sender: Please print your name, address, and ZIP+4 in this box •

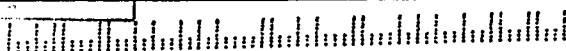
RECEIVED

AUG 18 2005

WASHINGTON REGIONAL OFFICE  
DWQ

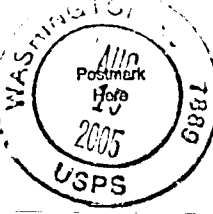
North Carolina Department of Environment and  
Natural Resources//Aquifer Protection  
Washington Regional Office  
943 Washington Square Mall  
Washington, North Carolina 27889

0007





7003 3110 0002 0580 4529

<b>U.S. Postal Service™</b> <b>CERTIFIED MAIL™ RECEIPT</b> (Domestic Mail Only; No Insurance Coverage Provided)		<i>AP - A Harris</i>
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>		
<b>OFFICIAL USE</b>		
Postage	\$	<i>.37</i>
Certified Fee		<i>2.30</i>
Return Receipt Fee (Endorsement Required)		<i>1.75</i>
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	<i>4.42</i>
		
Sent to Street or P.O. Box City, State, ZIP+4®	MR GILBERT RADCLIFFE RADCLIFFE MARINE SALES INC PO BOX 57 BELHAVEN NC 27810	

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR GILBERT RADCLIFFE  
 RADCLIFFE MARINE SALES INC  
 PO BOX 57  
 BELHAVEN NC 27810

2. Article (Transaction) Number: **7003 3110 0002 0580 4529**

**COMPLETE THIS SECTION ON DELIVERY**

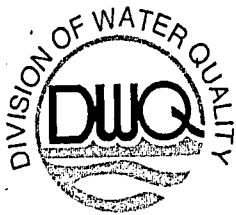
A. Signature  
 X *[Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery  
*[Signature]* *8/17/05*

D. Is delivery address different from item 1? ☐ Yes  
 If YES, enter delivery address below: ☐ No

3. Service Type  
☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes



Michael F. Easley, Governor

William G. Ross Jr., Secretary  
North Carolina Department of Environment and Natural Resources

Alan W. Klimek, P.E. Director  
Division of Water Quality

---

**DIVISION OF WATER QUALITY**  
**Aquifer Protection Section**  
August 5, 2005

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
7003 3110 0002 0580 4529

Mr. Gilbert Radcliffe  
Radcliffe Marine Sales, Inc.  
Post Office Box 57  
Belhaven, North Carolina 27810

RE: Soil and Groundwater Investigation Report  
Radcliffe Marine Sales, Inc.  
Highway 264  
Belhaven, Beaufort County, North Carolina  
APS Incident No. 85050

Dear Mr. Radcliffe:

The Washington Regional Office of the Division of Water Quality - Aquifer Protection Section has reviewed a Soil and Groundwater Investigation Report dated December 1996 and prepared by Triangle Environmental, Inc. This report indicates both acetone and volatile organic compounds (VOC) were detected above the Groundwater Quality Standards listed in Title 15A NCAC Subchapter 2L.

Subsequent to the submittal of this report, the Division of Waste Management issued a compliance letter for the any issues with acetone related contamination only. However, the remaining VOC contamination remains enforceable with the Division of Water Quality.

This office recommends for you to reassess the site to determine if soil and/or groundwater contamination still exists at the site. If you do not reassess the site, a Notice of Violation will be issued based on the December 1996 Soil and Groundwater Investigation Report. Your investigation for soil and groundwater cleanup must be submitted to this office within sixty days of receipt of this Notice.

We appreciate your attention and prompt response in this matter. If you have questions, please do not hesitate to call Analee Harris at (252) 948-3843.

Sincerely,

Analee Harris  
Hydrogeologist

✓ Cc: WaRO



---

North Carolina Division of Water Quality  
Aquifer Protection Section  
943 Washington Square Mall  
Washington, NC 27889  
PHONE: 252-946-6481 FAX: 252-975-3716  
Internet: gw.ehnr.state.nc.us

To: Ms. Willene Brinn, Privateer Boat Company

Fax Number: (252) 943-3010

From: Analee Harris

Date: August 19, 2005

No. Pages (including cover page): 3

Comments:

It was nice to meet Mr. Radcilffe and you this morning. I searched on the internet (yellow pages) for Environmental Consulting Firms in the vicinity of Belhaven. I am faxing you that list. In addition, I have listed contact information for the NC Board for the Licensing of Geologists. If you need their help for locating a geologist to perform your assessment, I'm sure they could help you find one licensed in Eastern NC. Please let me know if I can be of further assistance. I can be reached at (252) 948-3843. Thanks!

Analee Harris

A handwritten signature in black ink, appearing to read 'Analise', is written over the printed name 'Analee Harris'.

Environmental Consulting Firms from the Yellow Pages  
(listed in alphabetical order by city)

**ALLIED ENVIRONMENTAL SERVICES**

2411 CHARLES BOULEVARD, GREENVILLE, NC

27858

Phone: (252) 758-3311

[Map &](#)

[Directions](#)

---

**CBM ENVIRONMENTAL SERVICES**

1411 EVANS ST APT B, GREENVILLE, NC 27834

Phone: (252) 752-0200

[Map &](#)

[Directions](#)

---

**GMA GROUNDWATER MANAGEMENT  
ASSOCIATES INCORPORATED**

823A EVANS STREET, GREENVILLE, NC 27834

Phone: (252) 758-3310

[Map &](#)

[Directions](#)

---

**SPRUILLS & ASSOCIATES INCORPORATED**

2747 E 10TH STREET, GREENVILLE, NC 27858

Phone: (252) 757-1200

**EASTERN CAROLINA ENVIRONMENTAL SERVICES  
INCORPORATED**

WILLIAMSTON, NC 27892

Phone: (252) 792-0415

[Map &](#)

[Directions](#)

**COASTAL ENVIRONMENTAL**

7531 S VIRGINIA DARE TRAIL, NAGS HEAD, NC 27959

Phone: (252) 449-5029

**ENVIRONMENTAL PROFESSIONALS INC**

1404 S VIRGINIA DARE TRAIL, KILL DEVIL HILLS,

NC 27948

Phone: (252) 441-0239

[Map &](#)

[Directions](#)

---

**LAND MANAGEMENT GROUP INC**

504 S CROATAN HIGHWAY, KILL DEVIL HILLS, NC

27948

Phone: (252) 473-3400

[Map &](#)

[Directions](#)

**QUIBLE & ASSOCIATES PC**

8 JUNIPER TRAIL, KILL DEVIL HILLS, NC 27948

Phone: (252) 261-3300

I have not verified if any of these firms are or are not in business.

**NC Board for Licensing of Geologists**  
**PO Box 41225 Raleigh, NC 27629**  
**Phone: (919) 850-9669**  
**Website: [www.ncblg.org](http://www.ncblg.org)**

State of North Carolina  
Department of Environment  
Health and Natural Resources  
Division of Waste Management

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
William L. Meyer, Director

pros/GW-soil Report  
HKS 1638

DICK Denton HAS THE complete file, if  
you need additional information.

date?

Mr. Gilbert Radcliffe  
Radcliffe Marine Sales, Inc.  
P O Box 57  
Belhaven, NC 27810

Re: Compliance with Compliance Order - Docket # 95-638

Dear Mr. Radcliffe:

This office has reviewed the Soil and Groundwater Investigation Report as forwarded to us by your consultant, Triangle Environmental, Inc. on December 17, 1996. This sampling investigation was conducted to determine probable parameters of acetone contamination - acetone being detected in an earlier sampling event (May '95). The sampling points for this last event were in the relatively same areas as the earlier sampling event (May '95).

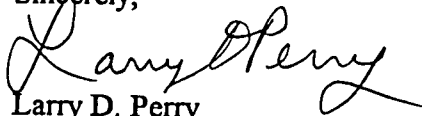
As indicated by this last analysis, there appears to be no indication of an acetone contamination problem in either soil or groundwater. There is an indication of oil/gasoline contamination due to the detection of several benzene compounds. Samples GP-4 and GP-5 indicate various levels of benzene and ethyl benzene, etc. The reported levels of benzene do not exceed the RCRA benzene level of 0.5 ppm, but they do indicate possible levels of concern. I am notifying DEM's Groundwater Section of this benzene contamination in order that they might review this situation.

It is the opinion of this office that there does not exist an acetone contamination problem at your facility. We do advise you to be aware of storage/containerization of your chemical solvents and take precaution in the management of both virgin and waste products in order to prevent possible future releases of materials.

Page Two  
Radcliffe

As of this letter, your facility has complied with Compliance Order 95-638. If you should have further questions please call my office at 919-733-4996 Ext. 213.

Sincerely,

A handwritten signature in cursive script, appearing to read "Larry D. Perry".

Larry D. Perry  
Compliance Supervisor

cc: Dick Denton  
Willie Hardison - DEM-Groundwater Section Washington  
John Hill - Triangle Environmental, Inc.  
Central Files

**SENDER: COMPLETE THIS SECTION**

- Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR GILBERT RADCLIFFE  
RADCLIFFE MARINE SALES INC  
PO BOX 57  
BELHAVEN NC 27810

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

8/17/05

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Artl

7003 3110 0002 0580 4529

(Transmit to)

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

4-24-2007 9:30 AM

WILLIE BRINN w/ PRIVATEER BOAT COMPANY CALLED IN RESPONSE TO NOT RECD., DATED 4-23-2007. NOT RECD. FORMER LETTER DATED AUG. 5, 2005. MS. BRINN CLAIMS SHE HAS NO KNOWLEDGE OF THIS LETTER. ASKED IF WE WOULD FAX COPY.

INC. # 85050

BELHAVEN

PRIVATEER BOAT COMPANY.

PHONE # 943-3731

FAX # 943-3010

- FAXED COPY OF 8-5-05 LETTER AGENT w/ COPY OF GREEN CARD.

- 4-24-07 9:45 AM.

C.S.



# Incident Management Data Entry Record

## Incident Information

4/23/2007 9:48:30AM

Incident Number	85050	Site Priority	80 D
Incident Name	RADCLIFFE MARINE SALES, INC.		
Incident Address	US HWY 264 BY-PASS NORTH		
Incident City/Town	BELHAVEN	Incident Zip	27810
County	Beaufort		
RO Contact	Rose Ballance		

## Responsible Party Information

RP Contact	RADCLIFF, GILBERT		
RP Company	RADCLIFFE MARINE SALES INC.		
RP Address	PO BOX 57		
RP City	BELHAVEN	RP State	North Carolina
RP Zip			
RP Phone			
Ownership Type	Private		
Operation Type	Commercial		

## Contamination Information

GW Contamination (Y/N) Yes

Sources	Type	Wells	
Surface Spill	Gasoline	Private Well	0
		Private NonDrinking	0
		Public Well	0

## Status Information

Report/Discovery Date	11/11/1996	Phase	Follow Up
Notice Date	01/23/1997	Next Due Date	07/25/2007
Next Action			
CSA Received		CAP Type	None
CSA Approved		CAP Received	
CSA Reviewed		CAP Reviewed	
Last Modified	04/23/2007	CAP Approved	
		CAP Implemented	

## Locational Information

Latitude (DMS)	353310	Longitude (DMS)	-763736
Latitude (DD)	35.553055	Longitude (DD)	-76.626944
Lat/Long QC	GPS Value	Quadrangle	N15h

Comments

SOIL AND GW SAMPLING PERFORMED TO DETECT ACETONE CONTAMINATION. FOUND SOIL AND GW CONTAM. WITH PETROLEUM CONSTITUENTS. NO ACETONE DETECTED. EPA METHOD 8 WAS USED. BENZENE AT 3,200 PPB.  
requesting reassessment of site. NOV sent 04/23/2007.

35°33'10.84"N

35°33'10.83"N

35°33'10.82"N

35°33'10.81"N

35°33'10.80"N

35°33'10.79"N

x 35°33'10.81296N  
76°37'31.62527W

76°37'31.65"W 76°37'31.64"W 76°37'31.63"W 76°37'31.62"W 76°37'31.61"W 76°37'31.60"W

## Radcliffe Marine

Lat/Long  
WGS 1984



Scale 1:10.0  
0 1.250  
Feet

R082913A.ssf  
8/30/02

GPS Pathfinder<sup>®</sup> Office



Mr. Freddie Martin  
December 14, 2001  
Page 2

We appreciate your cooperation along with your effort to protect the state's groundwater resources. Should you have any questions regarding this matter, please don't hesitate to call me at 252-946-6481, extension 354.

Sincerely,

Michelle Volosin  
Groundwater Section

cc: GMA, Inc.-101-E Woodwinds Industrial Court, Cary, NC 27511  
WaRO

# MEMO

DATE: \_\_\_\_\_

TO: \_\_\_\_\_

SUBJECT: \_\_\_\_\_

3 temp MW's installed w/ 1" PVC  
to 11' BLS.

Does acetone sink?

2 WSW, 1 w/in 1500' @ Cox Chevy

B = 31 ppb  
E = 3200 ppb  
X = 710 ppb

MTBE } < 2L STDS  
NAPTH }

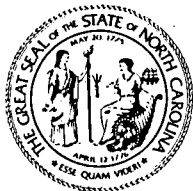
2L Violations

No UST's listed

\_\_\_\_\_  
Soil Samples  
& EPA Methods

\_\_\_\_\_  
GW Sample(s)  
& EPA Methods

From: \_\_\_\_\_



North Carolina Department of Environment,  
Health, and Natural Resources



Printed on Recycled Paper

## Incident Management Data Entry

### Incident Information

01/18/2001

Incident Number	85050	Site Priority	80 D
Incident Name	RADCLIFFE MARINE SALES, INC.		
Incident Address	US HWY 264 BY-PASS NORTH		
Incident City/Town	BELHAVEN	Incident Zip	27810
County	Beaufort		
ROContact	KEITH STARNER		

### Responsible Party Information

RP Contact	GILBERT RADCLIFF		
RP Company	RADCLIFFE MARINE SALES INC.		
RP Address	PO BOX 57		
RP City	BELHAVEN	RP State	NORTH CAROLINA
RP Zip	27810		
RP Phone			
OwnerShip Type	Private		
Operation Type	Commercial		

### Contamination Information

GWContam (Y/N)

Y

Sources	Type	Wells	
Surface Spill	Gasoline	Private Well	0
		Private NonDrinking	0
		Public Well	0

### Status Information

Report/Discovery Date	11/11/1996	Phase	Follow Up
Notice Date	01/23/1997	Next Due Date	
Next Action			
CSA Received		CAP Received	
CSA Approved		CAP Approved	
Last Modified	01/18/2001	CAP Type	None
Date Closed		CAP Implemented	No Data

*Locational Information*

Latitude (DMS)	351950	Longitude (DMS)	762224
Latitude (Decimal Degrees)	35.3308333333333	Longitude (Decimal Degrees)	76.3736111111111
Lat/Long QC	EST	Quad	N15h

*Comments*

SOIL AND GW SAMPLING PERFORMED TO DETECT ACETONE CONTAMINATION. FOUND SOIL AND GW CONTAM. WITH PETROLEUM CONSTITUENTS. NO ACETONE DETECTED. EPA METHOD 8260 WAS USED. BENZENE AT 3,200 PPB.

# MEMO

DATE: \_\_\_\_\_

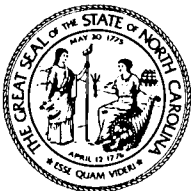
TO: File

SUBJECT: Radeliffe NOV

Was this NOV sent / rec'd  
by Radeliffe?

943 3731

From: \_\_\_\_\_



North Carolina Department of Environment,  
Health, and Natural Resources



Printed on Recycled Paper



State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Washington Regional Office

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary

Post-It™ brand fax transmittal memo 7671		# of pages	4
To	Keith Starner	From	Kathleen Waycott
Co	WARO - GW	Co.	AG's Office
Dept.		Phone #	
Fax #	919-975-3716	Fax #	

**DEHNR**

**DIVISION OF WATER QUALITY  
GROUNDWATER SECTION**

January 23, 1997

**CERTIFIED MAIL:**  
**RETURN RECEIPT REQUESTED**  
Z 152 026 988

Mr. Gilbert L. Radcliffe  
d.b.a./Radcliffe Marine Sales, Inc.  
Post Office Box 57  
Belhaven, North Carolina 27810

RECEIVED/DEHNR  
DEPT. GROUNDWATER SEC.  
97 JAN 27 AM 11:36

RE: Notice of Violation  
Oil Pollution and Hazardous Substance Control Act of  
1978 et seq. (General Statutes 143-215.75) and  
North Carolina Administrative Code Title 15A Subchapter 2L  
Classifications and Water Quality Standards Applicable  
to the Groundwaters of North Carolina (15A NCAC 2L)  
Radcliffe Marine Sales, Inc.  
Belhaven, Beaufort County, North Carolina

Dear Mr. Radcliffe:

North Carolina General Statutes, Chapter 143, authorize and direct the Environmental Management Commission of the Department of Environment, Health, and Natural Resources (DEHNR) to protect and preserve the water and air resources of the state. The Division of Water Quality (Division) has the delegated authority to enforce adopted pollution control rules and regulations.

Based on a Soil and Groundwater Investigation Report prepared for your facility located on Lamont Street in Belhaven, Beaufort County, North Carolina, the Division has reason to believe that Radcliffe Marine Sales, Inc. is responsible for activities resulting in noncompliance with North Carolina law. Groundwater samples reveal concentrations of contaminants above the standards listed in Title 15A, North Carolina Administrative Code, Subchapter 2L (15A NCAC 2L).

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A groundwater sample collected by Triangle Environmental, Inc., analyzed using EPA Method 8260, revealed the following concentrations of petroleum constituents expressed in parts per billion (ppb):

<u>Constituent</u>	<u>Samples*</u>	<u>Groundwater Standards</u>
Benzene	31	1
Ethylbenzene	3,200	29
Xylenes	710	530

\*Highest levels taken from samples GP-4 and GP-5

Such concentrations exceed Water Quality Standards, listed in NCAC Title 15A, Subchapter 2L .0202 (Groundwater Quality Standards).

The specific violations noted are as follows:

**1. G.S. 143-215.83 Discharges-(a) Unlawful Discharges-**

It shall be unlawful except as otherwise provided in this part, for any person to discharge, or cause to be discharged, oil or other hazardous substances into or upon any waters, tidal flats, beaches, or lands within this State, or into any sewer, surface water drain or other waters that drain into the waters of this State, regardless of the fault of the person having control over the oil or other hazardous substances, or regardless of whether the discharge was the result of intentional or negligent conduct, accident, or other cause.

The Division of Water Quality is authorized by the Environmental Management Commission (EMC) to require collection and removal of any unauthorized discharge of oil or other hazardous waste into or upon the lands or waters of the State. The following section in the Pollution Act is relevant to removing prohibited discharges.

**2. G.S. 143-215.84 Removal of Prohibited Discharges**

(a) Person discharging. - Any person having control over oil or other hazardous substances discharged in violation of this article shall immediately undertake to collect and remove the discharge and to restore the area affected by the discharge as nearly as may be to the condition existing prior to the discharge.

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**3. NCAC 2L .0103 (d)**

No person shall conduct or cause to be conducted, any activity which causes the concentration of any substance to exceed that specified in Rule .0202 of this Subchapter, except as authorized by the rules of this Subchapter.

**4. NCAC 2L .0202 (c)**

Substances which are not naturally occurring and for which no standard is specified shall not be permitted in detectable concentrations in Class GA or Class GSA groundwaters. The responsibility for complying rests with Radcliffe Marine Sales, Inc. Efforts to abate the source of contamination and to perform subsequent remedial actions should commence immediately.

Specifically, to correct the above violations, you must perform the following:

1. The source of groundwater/soil contamination must be identified and eliminated upon receipt of this notice.
2. All contaminated soils shall be removed and disposed of and/or properly treated in-situ in a method approved by the Department. Unless it can be demonstrated that residual contamination in the unsaturated zone will not result in violations of underground water quality standards or perpetuate any existing violations, all soil containing 10 ppm TPH for low boiling point fuels, 40 ppm TPH for high boiling point fuels, or 250 ppm for Oil and Grease or greater, must be removed or treated. It is recommended that you contact the Washington Regional Office Groundwater Section to obtain required permits.
3. Conduct an assessment to determine the horizontal and vertical extent of groundwater contamination. To assist you in conducting the investigation and preparing the Comprehensive Site Assessment (CSA) report, please find attached excerpts from the "Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater" (DEHNR 1993). Please refer to Section 15.1 pages 77 through 85. The report at a minimum must follow the attached format for the CSA to be considered complete.

A Well Construction Permit (application attached) is required to construct any monitor well on property other than that on which the unpermitted activity took place. Analyze all groundwater samples for the presence of petroleum hydrocarbon constituents using EPA Methods 602 and 625 (or other comparable analyses).

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The CSA must be conducted under the supervision of a Professional Engineer (P.E.) or Licensed Geologist (L.G.). The subsequent report must be signed and sealed by a P.E. or L.G. For information on available consultants and engineers, you may desire to contact the Consulting Engineers Council of North Carolina at (919) 781-7934, the North Carolina Board for Licensing of Geologists at (919) 850-9669, or the North Carolina Petroleum Marketers Association at (919) 782-4411.

Your CSA report must be submitted for review within ninety (90) days of receipt of this letter.

In the event the CSA shows an impact to soil or groundwater, the Washington Office may require you to submit additional information or to develop a Corrective Action Plan in accordance with NCAC Title 15A Subchapter 2L.0106 (Corrective Action) of the Groundwater Quality Standards.

Failure to respond within the time specified and to voluntarily achieve compliance may result in the issuance of a proposed penalty assessment by the Director under authority of G.S. 143-215.91, which provides that a civil penalty of not more than \$10,000.00 may be assessed against any person who intentionally or negligently discharges oil or other hazardous substances, or knowingly causes or permits the discharge of oil in violation of G.S. 143-215.75 et seq. If any action or failure to act is continuous, each day may be considered a separate violation.

You should contact us immediately of your intention to comply. Your response or questions should be directed to me or Keith Starnes of the Washington Regional Office at (919) 946-6481 ext. 354.

Sincerely,

*Walter Henderson*

for Jim Mulligan  
Regional Supervisor

Enclosures

cc: Department of Justice  
✓ Pollution Control Branch  
WaRO

# POLLUTION INCIDENT/U.S.T. LEAK REPORTING FORM

Department of Environment, Health, Natural Resources  
Division of Environmental Management  
GROUNDWATER SECTION

Confirm. GW Contamination (Y/N) Y  
Major Soil Contamination (Y/N)     
Minor Soil Contamination (Y/N) Y

Incident #                       
Date Incident Occurred  
or Leak Detected 11/11/96

## INCIDENT DESCRIPTION

Incident Location/Name RADCLIFFE MARINE SALES, INC  
Address PO BOX 57 (LAMONT ST.)  
City/Town BELHAVEN County BEAUFORT Region WASHINGTON  
Briefly Describe Incident SOIL & GW SAMPLING PERFORMED TO DETECT  
ACETONE CONTAMINATION FOUND SOIL & GW CONTAM.  
WITH PETROLEUM CONSTITUENTS. NO ACETONE DETECTED.  
EPA METHOD 8260 WAS USED. BENZENE AT  
3,200 ppb

## POTENTIAL SOURCE OWNER-OPERATOR

Potential Source Owner-Operator GILBERT L. RADCLIFFE Telephone                       
Company RADCLIFFE MARINE SALES, INC Street Address LAMONT ST.  
City BELHAVEN County BEAUFORT State NC Zip Code 27810

### OWNERSHIP

0. N/A 1. Municipal 2. Military 3. Unknown 4. Private 5. Federal 6. County 7. State

### OPERATION TYPE

0. N/A 1. Public Service 2. Agricultural 3. Residential 4. Educational/Relig. 5. Industrial 6. Commercial 7. Mining

## POLLUTANTS INVOLVED

MATERIALS INVOLVED	AMOUNT LOST	AMOUNT RECOVERED
<u>PETROLEUM</u>	<u>UNK</u>	<u>NONE</u>

## SOURCE OF POLLUTION

### PRIMARY SOURCE OF POLLUTION (Select one)

- |                          |                     |
|--------------------------|---------------------|
| 1. Intentional dump      | 13. Well            |
| 2. Pit, pond, lagoon     | 14. Dredge spoil    |
| 3. Leak-underground      | 15. Nonpoint source |
| 4. Spray irrigation      |                     |
| 5. Land application      |                     |
| 6. Animal feedlot        |                     |
| 7. Source unknown        |                     |
| 8. Septic tank           |                     |
| 9. Sewer line            |                     |
| 10. Stockpile            |                     |
| 11. Landfill             |                     |
| 12. <u>Spill-surface</u> |                     |

### PRIMARY POLLUTANT TYPE (Select one)

- |                           |
|---------------------------|
| 1. Pesticide/herbicide    |
| 2. Radioactive waste      |
| 3. <u>Gasoline/diesel</u> |
| 4. Heating oil            |
| 5. Other petroleum prod.  |
| 6. Sewage/septage         |
| 7. Fertilizers            |
| 8. Sludge                 |
| 9. Solid waste leachate   |
| 10. Metals                |
| 11. Other inorganics      |
| 12. Other organics        |

### LOCATION

- |                    |
|--------------------|
| 1. <u>Facility</u> |
| 2. Railroad        |
| 3. Waterway        |
| 4. Pipeline        |
| 5. Dumpsite        |
| 6. Highway         |
| 7. Residence       |
| 8. Other           |

### SETTING

- |                      |
|----------------------|
| 1. Residential       |
| 2. <u>Industrial</u> |
| 3. Urban             |
| 4. Rural             |

Site Priority  
Ranking

SO/D

D.E.M. Regional Contact  
STARNER

Signature

K. Starn

Date 1/21/97

## IMPACT ON DRINKING WATER SUPPLIES

WELLS AFFECTED

1. YES

2. NO

NUMBER OF WELLS AFFECTED \_\_\_\_\_

Well(s) Contaminated: (Users Name)

1.

2.

3.

4.

5.

Circle Appropriate Responses

Lab Samples Taken By:

1. DEM

2. DHS

3. Responsible Party

4. Other

5. None

Samples Taken Include:

1. Groundwater

2. Soil

### LOCATION OF INCIDENT

7 1/2 Min. Quad Name

BELHAVEN

Lat. : Deg : Min : Sec :

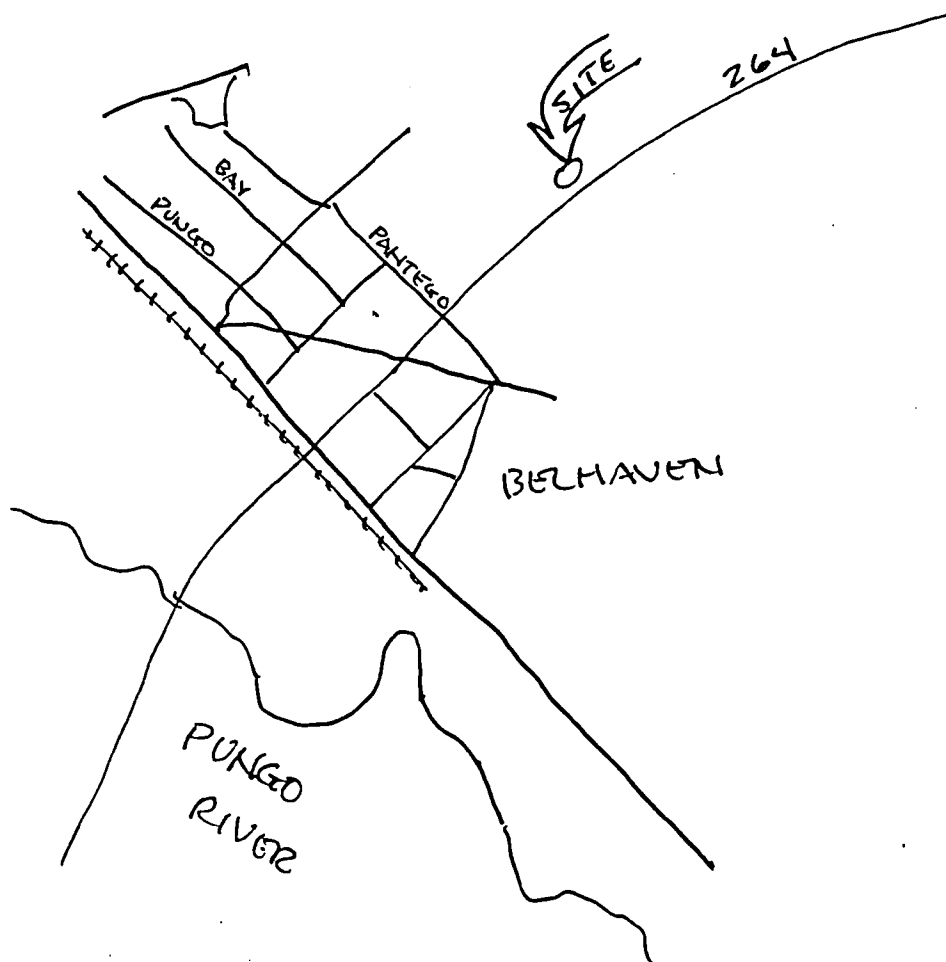
35° 33' 10" N

5 Min. Quad Number

Long. : Deg : Min : Sec :

76° 37' 38" W

Draw Sketch of Area or Attach Additional Maps



Incident Name: RADCLIFFE MARINE SALTS Region/County: WACO/BEAUFORTGroundwater Incident File #: \_\_\_\_\_ Ranking Performed by: STARNERDate: 1/21/97

**NORTH CAROLINA**  
**GROUNDWATER CONTAMINATION INCIDENT MANAGEMENT**  
**SITE PRIORITY RANKING SYSTEM**  
 (To be completed by Regional Office)

		<u>Points Awarded</u>
<b>I</b>	<b>IMMINENT HAZARD ASSESSMENT</b>	
A.	Vapor Hazard - free product in confined areas or vapor phase contamination detected at or above 20% of the lower explosive limit or at health concern levels; award 50 points total	_____
B.	Fire - free product subject to ignition in exposed areas such as surface water impoundments, streams, excavations, etc.; award 50 points total	_____
<b>II</b>	<b>EXPOSURE ASSESSMENT</b>	
A.	Contaminated Water Supplies	
1.	Private, domestic water supply well containing substances in concentrations exceeding 15A NCAC 2L groundwater quality standards; award 10 points per well	_____
2.	Public or institutional water supply well containing substances in concentrations exceeding 15A NCAC 2L groundwater quality standards; award 20 points per well	_____
3.	Exceedances of Class WS-1 surface water quality standards as a result of groundwater discharge; award 20 points per surface water body impacted	_____
4.	Any water supply well identified in items II. A. 1 or II. A. 2 that cannot be replaced by connecting to an existing public water supply source; award additional 10 points per irreplaceable well	_____
B.	Threat to Uncontaminated Drinking Water Supplies	
1.	Private, domestic water supply located within 1500 feet down gradient of the discharge, release or known extent of contamination; award 10 points per well	10 _____
2.	Public or institutional water supply well located within 1500 feet down gradient of the discharge, release or known extent of contamination; award 15 points per well	_____
3.	Raw surface water intake for public water supply located within 1/2 mile down gradient of the discharge, release or known extent of contamination; award 5 points per water supply system	_____
4.	Any well identified in items II. B. 1 or II. B. 2, or an intake item II. B. 3 located within 250 feet of the discharge, release or known extent of contamination; award additional 20 points total ( <u>not</u> per well or intake)	_____
C.	Vapor Phase Exposure	
1.	Contaminant vapors detected in inhabitable building(s), but levels are below 20% of the lower explosive limit and health concern levels; award 30 points total	_____

2. Contaminant vapors detected in other confined areas (uninhabitable buildings, sewer lines, utility vaults, etc.), but levels are below 20% of the lower explosive limit; award 10 points total

### III. SOURCE ASSESSMENT

- A. Uncontrolled or Unabated Contaminant Source (including dump sites, stockpiles, lagoon, contaminated soil, land applications, septic tanks, landfills, underground and above ground storage tanks, etc.)
  1. Suspected or confirmed primary source remains in active use and continues to receive raw product, wastewater or solid waste; award 30 points per source
  2. Active use of suspected or confirmed primary source has been discontinued or source was caused by a one-time release of product or waste; however, primary or secondary source continues to release product or contaminants into the environment; award 10 points per source

10

### IV. ENVIRONMENTAL VULNERABILITY ASSESSMENT

- A. Vertical Contaminant Migration - Literature or well logs indicates that no confining layer is present above bedrock or within twenty feet of land surface; award 10 points total
- B. Horizontal Contaminant Migration - Data or observations indicate that no discharge points or aquifer discontinuities exist between the discharge, release or known extent of contamination and the nearest down gradient drinking water supply; award 10 points total
- C. Existing Groundwater Quality - The worst case monitor or supply well contains contaminant levels:
  1. At less than 10 times the 2L groundwater standards; award 5 points
  2. Between 10 and 100 times the 2L groundwater standards; award 20 points
  3. Greater than 100 times the 2L groundwater standards; award 40 points

10

10

40

### V. REGIONAL OFFICE RESPONSE (LETTER RANK) (Put an X on the line next to all conditions that apply.)

#### CATEGORY A (one or more of the following conditions are present)

1. One or more water supply wells are contaminated and the persons using the wells are not served by an existing public water supply.
2. Petroleum vapors are present in confined areas at levels which pose a human health concern or an explosion hazard.
3. A treated surface water supply is in violation of the drinking water standards set out in rules adopted by the Commission for Health Services under G.S. 130A-315.

#### CATEGORY B (one or more of the following conditions are present)

1. One or more water supply wells are contaminated but the persons using the wells are served by an existing public water supply.



2. One or more water supply wells are in use within 1500 feet of the discharge, release or known extent of contamination, the wells are not contaminated, and the persons using the wells are not served by an existing public water supply. \_\_\_\_\_
3. Petroleum vapors are present in confined areas but do not currently pose a threat to human health or an explosion hazard. \_\_\_\_\_

**CATEGORY C** (both of the following conditions are present)

1. One or more water supply wells are present at a distance greater than 1500 feet of the discharge, release or known extent of contamination, and the persons using the wells are not served by an existing public water supply. \_\_\_\_\_
2. None of the identified water supply wells are contaminated. \_\_\_\_\_

**CATEGORY D** (both of the following conditions are present)

1. One or more water supply wells are present within 1500 feet of the discharge, release or known extent of contamination, but the persons using the wells are served by an existing public water supply. ☒ \_\_\_\_\_
2. None of the identified water supply wells are contaminated. ☒ \_\_\_\_\_

**CATEGORY E** (both of the following conditions are present)

1. Water supply well(s) are not present within 1500 feet of the discharge, release or known extent of contamination, and no known water supply well(s) are contaminated. \_\_\_\_\_
2. All persons within 1500 feet of the discharge, release or known extent of contamination are served by an existing public water supply. \_\_\_\_\_

**TOTAL POINTS AWARDED**

80/0  
#/Letter